

TSD File Inventory Index

Date: May 8, 2001

Initial: CMH/enevas

Facility Name: <u>RB & W Corporation</u>		
Facility Identification Number: <u>DHD004196 C14</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status <u>A-2</u>	1	.1 Correspondence
.1 Correspondence	4	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	4	C.1 Compliance - (Inspection Reports) <u>See C.1.2</u>
.3 Part A Application and Amendments		C.2 Compliance/Enforcement <u>C.2</u>
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents <u>C-3</u>
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies <u>D.1.2-D.1.4</u>
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos
.1 Correspondence <u>A.4.1-A.4.5</u>	1	.4 RFA Reports <u>See D.1.2</u>
.2 Closure/Post Closure Plans, Certificates, etc <u>See A.4.1</u>		D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 5

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: _____



State of Ohio Environmental Protection Agency

Northeast District Office

J E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

December 15, 2004

**RE: RB & W Corporation
OHD 004 196 614
Portage County**

Mr. Carl Brondel
Lamson & Sessions Co.
25701 Science Park Drive
Cleveland, Ohio 44122

Dear Mr. Brondel:

The U.S. Environmental Protection Agency (U.S. EPA) is required by the Government Performance and Results Act (GPRA) to establish a set of environmental measures to demonstrate facility wide program success. The Resource Conservation and Recovery Act (RCRA) measures are:

1. Risk to human health is controlled.
2. Contaminated ground water migration is controlled
3. A cleanup remedy has been selected; and
4. A cleanup remedy has been constructed.

These four measures will go into effect with the beginning of the Federal fiscal year (FFY) 2006 on October 1, 2005. The Region's goal is to achieve by the end of FFY2008 (September 30, 2008):

1. Control of human health risk at 95% of baseline facilities,
2. Control of contaminated ground water migration at 80% of baseline facilities,
3. Select remedies at 30% of baseline facilities; and
4. 20% of selected remedies will have been constructed.

Region 5 of U.S. EPA has identified a subset of 402 of the facilities that are subject to the RCRA Corrective Action Program requirements to be included in the FFY2008 GPRA Baseline. The former RB&W property located at 800 Mogadore Road Kent, Ohio has been selected as one of the 402 FFY2008 Baseline facilities located in Region 5. The National list of Baseline facilities can be found at www.epa.gov/oswer/correctiveaction.

To begin this process, Ohio EPA must complete Environmental Indicator Forms 725 (Human Exposures Under Control) and 750 (Migration of Contaminated Groundwater Under Control) for the property. Copies of the forms were sent via e-mail to your consultant, Matt Knecht, on December 10, 2004. In an effort to allow input from Lamson & Sessions as the current owner of the site, Ohio EPA is requesting that you complete the forms and return them to our office. Our office will review and comment on the forms upon receipt.

Mr. Carl Brondel
Lamson & Sessions Co.
December 15, 2004
Page 2

Ohio EPA's Division of Hazardous Waste Management acknowledges Lamson & Sessions participation in Ohio EPA's Voluntary Action Program. Entering into the 'MOA' track of the program now, and obtaining a covenant not to sue in a timely manner, will greatly reduce the possibility that Ohio EPA or the U.S. EPA will issue orders under Corrective Actions. Nevertheless, the Environmental Indicators process must be completed by Ohio EPA and you.

If you have any questions regarding this designation, please contact me at (330) 963-1159, or John Palmer at (330) 963-1232.

Sincerely,



Karen L. Nesbit
Division of Hazardous and Waste Management

KLN:cl

ec: Frank Popotnik, DHWM, NEDO, OEPA
John Palmer, DHWM, NEDO, OEPA

cc: Ed Lim, DHWM, NEDO, OEPA
Greg Rudloff, USEPA Region V
Hak Cho, USEPA Region V
Matt Knecht, HzW
Samuel R Martillotta, with Mansour, Gavin Gerlack and Manos Co. LLP

RECEIVED
OCT 30 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RB&W
CORPORATION

RONALD L. NORDSTROM
PLANT MANAGER

October 25, 1990

U.S. E.P.A.
Region 5
230 South Dearborn Street
Chicago, IL 60604

Attention: Mr. William H. Miner, Chief
Hazardous Waste Enforcement Branch

Re: RB&W Corporation
Docket No.: V-W-87-R-040

Subject: Amendment of Certification, dated December 14, 1987
(Attached)

Dear Sir:

It has come to our attention the above subject certification submitted in accordance with the above-referenced Docket No. Order, Paragraph A, was inaccurate. The corrected certification statement is as follows:

To the best of our knowledge, we certify that hazardous waste from the plating process line is no longer being generated or stored at our facility and that all previously generated and stored hazardous wastes from the plating process line have been properly disposed. Attached are copies of supporting manifests.

Page 2

The above amendment is submitted to clarify the ambiguity presented in the original certification. Please feel free to contact me at (216) 673-3446 if you have any questions regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, reading "Ronald L. Nordstrom". The signature is fluid and cursive, with the first name "Ronald" being the most prominent.

Ronald L. Nordstrom
Plant Manager

RN/tr

cc: Mr. Richard L. Shank, Director
Ohio E.P.A.
Division of Solid & Hazardous Waste Management
1800 Watermark Drive
P. O. Box 1044
Columbus, OH 43216-1044
Ref. OHD-004-198-614

comple
014D004196614

5HE-12

JAN 29 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John W. Bradshaw, R.S.
Deputy Health Commissioner
Department of Public Health
651 Middlebury Road
Kent, Ohio 44240

Re: Russell, Burdsall & Ward
Consent Agreement and Final Order

Dear Mr. Bradshaw:

Enclosed please find the requested copies of the documents required under paragraphs A and B of the December 3, 1987, Consent Agreement and Final Order (CAFO) (see page 2 of the Order portion). I will notify you upon receipt of the notification of compliance with the Order as required by paragraph E (see page 3 under the Order portion).

If you have any further questions regarding this matter, please contact me at (312) 886-1478.

Sincerely yours,

Kimberly Ogle
RCRA Enforcement Section

Enclosure

5HE-12	KOGLE:fharris:6-1	OTHER:1/2	UNIT 8	SECT. SEC'Y	SECT. CHIEF	HWB CHIEF	WMD CHIEF
INIT. DATE	1/25/88	KO 1-27-88	CMF J.B. 1/29/88				

Comp
File

04D004196
614

JAN 29 1988

Consent Agreement and Final Order
RB & W Corporation (Docket No. V-W-87-R-040)

Kimberly Ogle
RCRA Enforcement Section

Thea Dunmire
Office of Regional Counsel

This is to inform you that on January 20, 1988, Calfee, Halter and Griswold representing Russell, Burdsall and Ward submitted the documents required under paragraphs B and C of the CAFO, effective December 3, 1987. The closure plan (paragraph B) was forwarded to the Permit Unit for approval review. The check for \$35,000 (paragraph C) was forwarded to Beverley Shorty, Regional Hearing Clerk. Attached is a copy for your files.

Attachment

5HE-12:KOGLE:fharris:6-1478:1/21/88

INIT. DATE	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	DEPT. SECY	SECT. CHIEF	HWB CHIEF	WWD DIR
1/25/88	JV	KO 1-27-88		CM for J.B. 1/29/88				

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166

Telex 980499

January 19, 1988

VIA FEDERAL EXPRESS

United States Environmental
Protection Agency
Region V
Waste Management Division
RCRA Enforcement Section
230 South Dearborn Street
Chicago, IL 60604

Attention: Kimberly Ogle

Re: RB&W Corporation, CAFO
Docket No.V-W-87 R-040

Dear Ms. Ogle:

Enclosed is a Closure Plan, prepared in accordance with the applicable requirements, which RB&W Corporation proposes to execute in compliance with paragraph B of the Consent Agreement and Final Order entered in the above-captioned matter. Also enclosed is RB&W's check in the amount of \$35,000 to satisfy the civil penalty specified in paragraph C of that order.

Please let us know as soon as possible whether the enclosed Closure Plan is approved, so that RB&W may begin to take the actions specified therein. If you have any questions regarding the enclosed, please call me.

Very truly yours,


Mark I. Wallach

MIW: fmm

Enclosures

cc: Regional Hearing Clerk, U.S. EPA
Solid Waste and Emergency Response
Branch Secretary

RECEIVED
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
CHICAGO, ILLINOIS

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
230 SOUTH DEARBORN
CHICAGO, ILLINOIS 60604

1/19/88

RB & W CORPORATION
800 MOGADORE ROAD
KENT
OHIO
44240

RE: ARCN 88163

DEAR

The enclosed document indicates that your account has been outstanding for over 30 days and is now considered delinquent. Interest at the annual rate of 7.000 % is now being charged for each day beginning 12/ 3/87 .

You are also being assessed a late payment handling charge of \$20.00 for the first 30 day late period and an additional \$10.00 for each subsequent 30 day period based on current EPA processing costs.

An additional 6% per annum penalty charge on the remaining principal is going to be assessed if not paid within 90 days of the due date.

A summary of your account as of 1/ 2/88 is as follows:

Original Debt	\$	35000.00
First 30 Days Interest	\$	203.00
Late Payment Handling Charge	\$	20.00
Total Amount Due	\$	35223.00

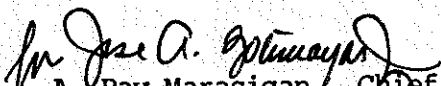
Please indicate the ARCN number on your check or money order made payable to the U.S. ENVIRONMENTAL PROTECTION AGENCY, to the following address:

US Environmental Protection Agency
Region V
P.O. Box 70753
Chicago, Illinois 60673

If you have any questions regarding this debt, your inquiry should be directed to Joe Zotomayor at (312)886-7520 or mailed to the Finance & Accounting Section (5MFP-14), US Environmental Protection Agency, 230 South Dearborn, Chicago, Illinois 60604.

If we do not hear from you within 30 days from the date of this letter, we will assume you concur with the amount of this bill.

Sincerely yours,


A. Ray Marasigan, Chief
Finance & Accounting Section



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

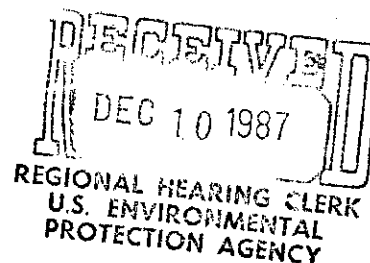
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

DEC 8 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys At Law
1800 Society Building
Cleveland, Ohio 44114-2688



Re: RB & W Corporation
Docket No.: V-W-87-R-040

Dear Mr. Wallach:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by RB & W Corporation. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosure

cc: Michael Savage, OEPA

COMPFIX
OH D004196614

5HE-12

JAN 14 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys at Law
1800 Society Building
Cleveland, Ohio 44114-2688

Re: Extension for CAFO Requirement
RB & W Corporation
Docket Number: V-W-87-R-040

Dear Mr. Wallach:

This letter is to confirm your telephone conversation with Kimberly Ogle on January 6, 1988, regarding a ten (10) day extension for the submittal of the closure plan as specified on page 2 of the December 3, 1987, Consent Agreement and Final Order (CAFO) (See B under the Order portion). Under the requirements of the CAFO, the document is due on January 10, 1988. Allowing for a ten (10) day extension, we shall expect the document in our office on January 20, 1988. Please note all other requirements of the CAFO remain unchanged.

If you have any questions regarding this matter, please contact Kimberly Ogle of my staff at (212) 825-1478.

Sincerely yours,

William E. Munc, Chief
RCRA Enforcement Section

cc: Michael Savage, OEPA-CO
Ernest Gear, Plant Manager, RB & W Corp.

hcc: Thea Dunmire, ORC

5HE-12	RECEIVED	RECEIVED	RECEIVED	RECEIVED	RECEIVED	RECEIVED	RECEIVED
DATE	1/11/88	1/11/88	1/11/88	1/12/88			



DEPARTMENT OF PUBLIC HEALTH

651 Middlebury Road

KENT, OHIO 44240

678-8109 Area Code 216

January 11, 1988

RECEIVED
JAN 15 1988
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Kimberly Ogle, 5HE-12
USEPA
Region 5
230 South Dearborn St.
Chicago, Ill 60604

re: Russell Burdsall & Ward
Consent Agreement & Final Order
December 3, 1987

Dear Ms. Ogle:

We are in receipt of the above referenced document. Please forward to my attention the documents required under Paragraphs A, B and E of the Final Order as they pertain to the zinc phosphating, acid pickling and cadmium plating lines. Thank you, in advance, for your attention to this matter.

Sincerely,

John B. Bradshaw

John B. Bradshaw, R.S.
Deputy Health Commissioner

JBB/ki
cc: file
John Ferlito

*comp FILE
DHD 004196614*

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166
Telex 980499

January 6, 1988

United States Environmental
Protection Agency
Region V
Waste Management Division
RCRA Enforcement Section
230 South Dearborn Street
Chicago, IL 60604

Attention: Kimberly Ogle

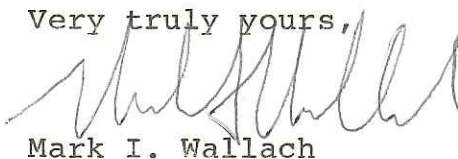
Re: RB&W Corporation, CAFO
Docket No.V-W-87 R-040

Dear Ms. Ogle:

Confirming our telephone conversation of this date, you have agreed to grant RB&W Corporation an extension of ten days, until January 20, 1988, to comply with the requirements of paragraph B of the Consent Agreement and Final Order entered in the above-captioned proceeding, to submit a closure plan for the tank and drum storage areas.

Your consideration in agreeing to this extension is greatly appreciated.

Very truly yours,



Mark I. Wallach

MIW: fmm

RB&W
CORPORATION

MENTOR, OHIO 44060

CO. CHECK
FIRST NATIONAL BANK OF ASHLAND
AN AFFILIATE OF
NATIONAL CITY BANK
CLEVELAND, OHIO 44101

0288874

January 5, 1988

\$**35,000.00

RB&W
CORPORATION

John Johnson

US EPA Region V
Finance & Accounting
230 South Dearborn Street
Chicago, Illinois 60604
DATE
AMOUNT

1/29/88
35000

88163

PAY *****35,000 DOLLARS AND 00 CENTS

TO THE ORDER OF:

Treasurer of the United States of America
U.S. EPA, Region V
P.O. Box 70753
Chicago, Illinois 60673

Non-responsive

PLEASE DETACH & RETAIN

MENTOR, OHIO 44060

Calfee, Halter & Griswold
Attorneys At Law
1800 Society Building
Cleveland, Ohio 44114-2688

HE

Re: RB & W Corporation
Docket No.: V-W-87-R-040

Dear Mr. Wallach:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by RB & W Corporation. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

William H. Miner

William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosure

cc: Michael Savage, OEPA

RECEIVED
JAN 10 1988

JAN 10 1988

ENVIRONMENTAL
PROTECTION AGENCY
REGION V

5HE-12

04D 004 196 614

JAN 05 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John W. Bradshaw, R.S.
Department of Public Health
651 Middlebury Road
Kent, Ohio 44240

Re: Russell Burdsall & Ward
Consent Agreement and Final Order

Dear Mr. Bradshaw:

Enclosed please find a copy of the December 3, 1987, Consent Agreement and Final Order (CAFO) you requested in your September 24, 1987, letter to Mr. Paul Dimock.

If you have any further questions regarding this matter, please contact Kimberly Ogle of my staff at (312) 353-7968.

Sincerely yours,

ORIGINAL SIGNED BY

WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

Enclosure

5HE-12:KOGLE:fharris:3-7968:12/16/87

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWED CHIEF	WWD DIR
INT. DATE	JJA 12/21/87	KO 12-23-87		DLB 12-3-87	O-R 12/20/87	WEM 1/4/88		

P 298 723 293

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Mr. Mark Wallach
Calfee, Halter & Griswold
Street and No.
1800 Society Building
P.O. State and ZIP Code
Cleveland, OH 44114-2688

Postage	\$ 22
Certified Fee	75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	70
Return Receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 167
Postmark or Date	

Kimberly Ogile (5HE-12) RCRA Enforcement Sect.

Envelope to the right

5HE-12

DEC 23 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys at Law
1800 Society Building
Cleveland, Ohio 44114-2688

Re: Change of U.S. EPA Contact
RB & W Corporation CAFO
Docket Number: V-W-87-B-040

Dear Mr. Wallach:

This letter is to notify you that any required documents, certifications, and notifications submitted pursuant to the above-referenced Consent Agreement and Final Order (CAFO) should be addressed to: United States Environmental Protection Agency, Region V, Waste Management Division, RCRA Enforcement Section, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Kimberly Ogle. This is a modification of paragraph E under the Order portion, page 3, of the December 3, 1987, CAFO.

If you have any questions regarding this matter, please contact Kimberly Ogle
of my staff at (912) 353-7968.

ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

cc: Michael Savage, OEPA-CO

CC: Michael Savage - OPERA	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWR CHIEF	WARD DIR
5HE-INT: KODGE, Pharris: 34	TYPIST	AUTHOR	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWR CHIEF
DATE: 12/15/87			4/87	RS for 12/31/87	WEM 12-23-87	

RECEIVED

DEC 16 1987

MIW

RB&W

December 14, 1987

*Compliance
File
12-18-87
OHD 004 196 614*
ERNEST W. GEAR
PLANT MANAGER

U.S. E.P.A.
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

Attn: Mr. William H. Miner, Chief
Hazardous Waste Enforcement Branch

Dear Sir:

We submit this letter in accordance with docket V-W-87-R-040
number A.

To the best of our knowledge we certify that hazardous waste
is no longer being generated or stored at our facility and that all
previously generated and stored hazardous wastes have been properly
disposed. Attached are copies of supporting manifest.

Sincerely,

Ernest Gear

Ernest Gear
Kent Plant Manager

attachments

cc: Calfee, Halter & Griswold
Attorneys At Law

EG/cr

RECEIVED
DEC 18 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OHD004196614		Manifest Document No. 16720		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
		3. Generator's Name and Mailing Address R.B.&W. CORP. 800 Mogadore Road, Kent, OH 44240		6. US EPA ID Number OHD980568992		C. State Transporter's ID		52234H			
4. Generator's Phone (216) 673-3446		7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		216-456-6238			
9. Designated Facility Name and Site Address Envirite Corporation 2050 Central Ave., S.E. Canton, OH 44707		10. US EPA ID Number OHD980568992		E. State Transporter's ID		F. Transporter's Phone					
				G. State Facility's ID		H. Facility's Phone		216-456-6238			
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol			
				No. Type						I. Waste No.	
				a. <input checked="" type="checkbox"/> WASTE CYANIDE LIQUID NOS F007, UN1935 POISON B		001 TT		1480		<input checked="" type="checkbox"/> G F007-	
				b.							
				c.							
d.											
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above					
15. Special Handling Instructions and Additional Information											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage; or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name R.A. THOMAS					Signature <i>R.A. Thomas</i>			Month Day Year 8 25 87			
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name TEDDY J SEERY					Signature <i>Teddy J Seery</i>			Month Day Year 08 25 87			
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name					Signature			Month Day Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name Michael L. Fasset					Signature <i>Michael L. Fasset</i>			Month Day Year 8 25 87			

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. **04D0041966141** Manifest Document No. **0016**

2. Page 1 of Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

BB+W
300 Mogadore Road Kent, Ohio 44240

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (216) 673-3446 Mr. Nick George

C. State Transporter's ID

D. Transporter's Phone (405) 324-5011

5. Transporter 1 Company Name

USPCT

6. US EPA ID Number

10RD 981514474

E. State Transporter's ID

F. Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

G. State Facility's ID

H. Facility's Phone

9. Designated Facility Name and Site Address

P.P.M. Inc
4105 Whitaker Ave
Philadelphia PA 19124

10. US EPA ID Number

LPAD 981113749

(215) 425-5144

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

1. Waste No.

a. **WASTE HAZARDOUS substance Liquid NOS**
ORM-E NA9188 (Polychlorinated Biphenyls)
RQ (10/4,54) EPA-EP TOXIC (oil)

No. Type

1 TT

Quantity

725

Unit

G

Waste No.

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

DIKE AND CONTAIN IN CASE OF spill

Retrofill # 7003406

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

Nick George

Signature

Nick George

Month Day Year

12 16 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Kenneth E Gornall

Signature

Kenneth E Gornall

Month Day Year

12 16 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

749 Total gallons

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Michael F. Spielberger

Signature

Michael F. Spielberger

Month Day Year

10 7 17 87

EQUAL TO OR IN EXCESS OF
HAZARDOUS WASTE ASSIGNED
VALUE TO NATIONAL RESPONSE
CENTER

800-424-8802

RQ's - 5000/1000/100/10/1

a.

=

c.

RQ =

b.

RQ =

d.

RQ =

CHEM TREC

EPA HOTLINE

CDC POISON CENTER

DOT

= 800-424-9300

= 800-424-9346

= 404-635-5313

= 202-426-1830

PLACARDS
PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

RB& W CORPORATION
800 MOGADORE ROAD, KENT, OHIO 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name

ENVIRITE CORPORATION

6. US EPA ID Number

101H1D986151618992

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

ENVIRITE CORPORATION
2050 CENTRAL AVE. S. E.,
CANTON, OHIO 44707

10. US EPA ID Number

101H1D981056891912

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. SPENT SULFURIC ACID PICKLE - UN 1832
LIQUOR (RQ 1000/454) UNIQUE CORROSIVE MAT.

b. K062

c.

d.

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

0101T1T 00654 G K062

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

NICK P. GEORGE

Signature "On behalf of"

Nick P. George

Month Day Year
6 30 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Randy Gehring

Signature

Randy Gehring

Month Day Year
6 30 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

DON GRITZINGER

Signature

Don Gritzinger

Month Day Year
6 30 87

EQUAL TO OR IN EXCESS OF
HAZARDOUS WASTE ASSIGNED
VALUE TO NATIONAL RESPONSE
CENTER
800-424-8802

RO's - 5000/1000/100/10/1
a. R
b. RQ =
c. RQ =
d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

HAZARDOUS
WASTE
PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

OH D 0 0 4 1 9 6 6 1 4 0 0 1 5 6

Manifest
Document No.

2. Page 1

1 of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

R B & W CORPORATION
800 MOAGADORE ROAD, KENT, OHIO 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name

ENVIRITE CORPORATION

6. US EPA ID Number

OH D 9 8 0 5 6 8 9 9 2

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

ENVIRITE CORPORATION
2050 CENTRAL AVENUE S. E.
CANTON, OHIO 44707

10. US EPA ID Number

OH D 9 8 0 5 6 8 9 9 2

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID 52234-HW

D. Transporter's Phone 456-6238

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

216-456-6238

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13. Total

Quantity

14. Unit

Wt/Vol

15. Waste No.

a. SPENT SULFURIC ACID PICKLE
LIQUOR (RQ 1000/454)

b. UN1832 CORROSIVE MATERIAL (2)

(K062)

D D I T T

5,169 G

K062

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name

McArthur Milby

Signature "On behalf of"

McArthur Milby

Month Day Year

105 2 2 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Keith Withrich

Signature

Keith Withrich

Month Day Year

105 2 2 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Don Gritzinger

Signature

Don Gritzinger

Month Day Year

105 2 2 87

REPORT ANY UNRECOVERED DIS-
CHARGE EQUAL TO OR IN EXCESS OF
EACH HAZARDOUS WASTE ASSIGNED
"RQ" VALUE TO NATIONAL RESPONSE
CENTER

800-424-8802

REPORTABLE QUANTITY VALUE
RQ's - 5000/1000/100/10/1

a. = c. RQ =
b. RQ = d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PLACARDS
PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240		01 H D 01 01 41 91 61 61 11 41 01 01 51 41		A. State Manifest Document Number		
4. Generator's Phone (216) 673-3446		6. US EPA ID Number		B. State Generator's ID		
5. Transporter 1 Company Name ALCHEM-TRON INC.		01 H D 01 71 71 71 81 61 31 01 91		C. State Transporter's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone		
9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127		10. US EPA ID Number		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 216-441-5628		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt./Vol	I. Waste No.
a. #1 OIL SWEEPINGS NON-HAZARDOUS		001	DM	110	G	N/A
b. #2 BONDERITE-WASTE CORROSIVE LIQUID COR. UN 1760		14	DM	770	G	D002
c. #3 SOAK CLEANER WASTE NON-HAZARDOUS		004	DM	220	G	N/A
d. #4 PHOSPHATE-HAZARDOUS WASTE SOLID ORM-E UN 9189		011	DM	275	G	D006
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above T21-45 T4-45 T21-45 T21-45		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name NICK P. GEORGE		Signature "On behalf of" Carl P. Wohlwend		Month Day Year 10/4/16/87		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name E.W. Freck		Signature E.W. Freck		Month Day Year 01/16/87		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name P. SINGH						
Signature P. Singh For Alch-Tron		Month Day Year 10/16/87				

AT ANY UNRECOVERED DIS- LARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300	PLACARDS PROVIDED
	a. RQ	c. RQ =	EPA HOTLINE = 800-424-9346	
	b. RQ =	d. RQ =	CDC POISON CENTER = 404-635-5313	
			DOT = 202-426-1830	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 01HD00419661400154		Manifest Document No. 4	2. Page 1 2 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240 4. Generator's Phone (216) 673-3446					A. State Manifest Document Number		
5. Transporter 1 Company Name ALCHEM-TRON INC.					B. State Generator's ID		
6. US EPA ID Number 01HD077786309					C. State Transporter's ID		
7. Transporter 2 Company Name					D. Transporter's Phone		
8. US EPA ID Number					E. State Transporter's ID		
9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127					F. Transporter's Phone		
10. US EPA ID Number 01HD980569438					G. State Facility's ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)					12. Containers No. Type		13. Total Quantity
a. #5 ULTRA SOLVENT-ORM-A WASTE TRICHTLORETHANE - UN 2831					003 DM		165
b. #6 PICKLE FINE BOTTOM OF TANK NON-HAZARDOUS					002 DM		275
c. #7 HYDROCHLORIC ACID - COR WASTE CORROSIVE LIQUID - UN 1760					001 DM		55
d.							
14. Unit Wt/Vol					15. Waste No.		
J. Additional Descriptions for Materials Listed Above					K. Handling Codes for Wastes Listed Above T50-63 TA TA		
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name NICK P. GEORGE					Signature "On behalf of" Carl P. Wohlwend		Month Day Year 04/16/87
17. Transporter 1 Acknowledgement of Receipt of Materials					Signature E.W. Frock		Month Day Year 04/16/87
18. Transporter 2 Acknowledgement of Receipt of Materials					Signature P. Singh		Month Day Year 04/16/87
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name P. SINGH					Signature P. Singh For Alchem-Tron		Month Day Year 04/16/87

REPORT ANY UNRECOVERED DISCHARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300 EPA HOTLINE = 800-424-9346 CDC POISON CENTER = 404-635-5313 DOT = 202-426-1830	PLACARDS PROVIDED
	a. _____	c. RQ = _____		
	b. RQ = _____	d. RQ = _____		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D00419661400162		Manifest Document No. 1 of 2		2. Page 1 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB & W CORPORATION 800 MOGADORE ROAD - KENT, OHIO 44240				A. State Manifest Document Number			
4. Generator's Phone (216) 673-3446				B. State Generator's ID			
5. Transporter 1 Company Name ALCHEM-TRON INC		6. US EPA ID Number OH D981795206		C. State Transporter's ID OH D981795206		D. Transporter's Phone 216-659-4813	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127		10. US EPA ID Number OH D980569438		G. State Facility's ID		H. Facility's Phone 216-441-5628	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. PHOSPHATE WASTE A08685 RQ 1 - ORM E - UN 9189				005 DM	275 G		D006
b. HYDROCHLORIC ACID WASTE A08687 CORROSIVE LIQUID NOS UN 1760				001 DM	55 G		D002
c. HEAVY OIL SLUDGE - NON-HAZARDOUS SOLID #A09532				006 DM	330		N/A
d. NON-HAZARDOUS LIQUID CLEANER - SOLVENT #A21801				002 DM	110		N/A
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above T21-W T21-W			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name NICK P. GEORGE				Signature On behalf of Nick P. George		Month Day Year 09/28/87	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name WALLACE E. BOOTH				Signature Wallace E. Booth		Month Day Year 09/28/87	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name JOHN BONDEA							
Signature John Bondea for AL-TRON				Month Day Year 09/28/87			

ANY UNRECOVERED DIS- AGE EQUAL TO OR IN EXCESS OF HAZARDOUS WASTE ASSIGNED "Q" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300 EPA HOTLINE = 800-424-9346 CDC POISON CEN = 404-635-5313 DOT = 202-426-1830	PLACARDS PROVIDED
	a. RC b. RQ =	c. RQ = d. RQ =		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. PHD000419661400162	Manifest Document No. Z of Z	2. Page 1 Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RBFW CORPORATION 800 MOGADORE ROAD - KENT, OHIO 44240			A. State Manifest Document Number		
4. Generator's Phone (216) 673-3446			B. State Generator's ID		
5. Transporter 1 Company Name ALCHEM-TRON, INC.		6. US EPA ID Number DHD981795206	C. State Transporter's ID DHD981795206		
7. Transporter 2 Company Name		8. US EPA ID Number	D. Transporter's Phone 216-659-4813		
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127		10. US EPA ID Number DHD980569438	E. State Transporter's ID		
			F. Transporter's Phone		
			G. State Facility's ID		
			H. Facility's Phone 216-441-5628		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) CADMIUM WASTE FILTERS #A09530 ORM-E HAZARDOUS WASTE SOLID		12. Containers No. Type 001 DM	13. Total Quantity 40 LB	14. Unit Wt/Vol LB	I. Waste No. D006
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above T27-45			
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name NICK P. GEORGE		Signature On behalf of <i>Nick P. George</i>		Month Day Year 09/28/87	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name WALLACE E. BOOTH		Signature <i>Wallace E. Booth</i>		Month Day Year 09/28/87	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name JOHN BONDEA					
		Signature <i>John Bondea for Al-Tron</i>		Month Day Year 09/28/87	

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OHDO0419661400161		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address R B & W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240				A. State Manifest Document Number			
				B. State Generator's ID			
4. Generator's Phone (216) 673-3446				C. State Transporter's ID			
5. Transporter 1 Company Name ALCHEM-TRON INC				D. Transporter's Phone 216-659-4813			
7. Transporter 2 Company Name				E. State Transporter's ID			
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127				F. Transporter's Phone 216-441-5628			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	14. Unit Wt/Vol
				No.	Type		
a. OIL CONTAINING CYNIDE A21799 LIQUID NOS - UN 189 RQ10 POISON "B"				001	DM	55 G	F010
b. CYNIDE POT (CYNIDE POWDER) A21800 - RQ10 - UN 1588 POISON "B" - CYNIDE MIXTURE DRY NOS				001	DM	55 G	F011
c. CADMIUM BATH WASTE A10317 (SLUDGE) UN 1588 - POISON "B" RQ10				001	DM	55 G	F008
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
				T27-50-38-b3 T27-45 T27-45			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.							
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Printed/Typed Name NICK P. GEORGE				Signature "On behalf of" N. P. George		Month Day Year 09/28/87	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name WALLACE E. BOOTH				Signature Wallace E. Booth		Month Day Year 09/28/87	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name JOHN BONDEA				Signature John Bondea for Al-Tron		Month Day Year 09/28/87	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5CS-TUB-3

DEC 10 1987

Honorable J.F. Greene
Office of Administrative Law Judges (A-110)
U.S. Environmental Protection Agency
401 N Street S.W.
Washington, D.C. 20460

Re: RB&W Corporation
Docket No. RCRA-V-W-87-R-040

Dear Judge Greene:

Attached is a copy of the fully executed Consent Agreement
and Final Order for this case.

Respectfully submitted,

Thea D. Dunmire

Thea D. Dunmire
Assistant Regional Counsel

cc: Mark I. Wallach, Esq.
Attorney for Respondent

Beverly Shorty
Regional Hearing Clerk



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HE-12

DEC 8 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys At Law
1800 Society Building
Cleveland, Ohio 44114-2688

Re: RB & W Corporation
Docket No.: V-W-87-R-040

Dear Mr. Wallach:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by RB & W Corporation. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

A handwritten signature in black ink, which appears to read "William H. Miner". The signature is written in a cursive style.

William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosure

cc: Michael Savage, OEPA

246.527.435

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys At Law
1800 Society Building
Cleveland, Ohio 44114-2688

DEC 8 1987

Re: RB & W Corporation
Docket No.: V-W-87-R-040

Dear Mr. Wallach:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by RB & W Corporation. A fully executed copy of the Consent Agreement and Final Order is enclosed for your file.

Your cooperation in resolving this matter is appreciated.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM H. MINER

William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosure ✓

cc: Michael Savage, OEPA ✓

bcc: Regional Hearing Clerk ✓
Thea Dunmire, ORC ✓
Paul Dimock, RES ✓
Denise Reape ✓
Robert Small, OWPE, WH-527 ✓

5HE-12:PDIMOCK:fharris:6-4436:10/9/87

INT. DATE	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWER CHIEF	WHD DIR
10/13/87	PH	P.E.D. 11-23-87		P.E.D. 11-23-87	GP 11/24/87	WEY 11/24/87	WHD 12/1/87	

TDD
11/27/87
JP 11/27/87

Zotomayer 5MF ✓

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

RB & W CORPORATION
800 MOGADORE ROAD
KENT, OHIO 44240

EPA I.D. No.: OHD 004 196 614

)
) DOCKET No.: V-W-87-R-40
)
)

) CONSENT AGREEMENT AND
) FINAL ORDER
)

On April 9, 1987, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA), 42 U.S.C. §6928, and the United States Environmental Protection Agency's (U.S. EPA) Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, U.S. EPA. The Respondent is RB & W Corporation.

The Parties to this action being desirous to settle this action enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Order (Docket No. V-W-87-R-40) in this matter;
2. The Regional Administrator has jurisdiction over this matter pursuant to Section 3008 of RCRA, 42 U.S.C. §6928;
3. Respondent operates a facility located at 800 Mogadore Road, Kent, Ohio 44240;
4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint;
5. Respondent explicitly waives its right to request a hearing regarding the allegations contained in the Complaint;

6. Respondent consents to the issuance of the Order hereinafter recited, and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated; and
7. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Order in this matter:

- A. Respondent shall, within five (5) days of the effective date of this Order, submit a certification stating that hazardous waste is no longer being generated or stored at the facility and that all previously generated and stored hazardous waste has been properly disposed. Copies of supporting manifests should accompany the certification. The U.S. EPA/Ohio Environmental Protection Agency reserves the right to perform an inspection to determine compliance with this paragraph.
- B. Respondent shall, within thirty (30) days of the effective date of this Order, submit a closure plan, prepared in accordance with the requirements contained in 40 CFR 265.112 and 265.179, which describes how and when the tank and drum storage areas were closed. Respondent shall also submit a certification of closure pursuant to 40 CFR 265.115.
- C. Respondent shall pay a civil penalty in the amount of THIRTY-FIVE THOUSAND DOLLARS (\$35,000), payable to the Treasurer of the United States of America within thirty (30) days of the effective date of this Order. Said payment shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should also be sent to both the Regional

Hearing Clerk, Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, 111 West Jackson Boulevard, Chicago, Illinois 60604.

D. The U.S. EPA may collect interest on any amounts overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. 63717. A late payment handling charge of \$20.00 will be imposed on a late payment. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.


E. Respondent shall notify U.S. EPA in writing within fifteen (15) business days upon achieving compliance with this Order. This notification shall be submitted to Mr. Paul Dimock, U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Section. A copy of these documents shall also be submitted to Michael Savage, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of the Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

The above Consent Agreement and Final Order consisting of 4 pages is hereby consented to by both of the parties to this proceeding.

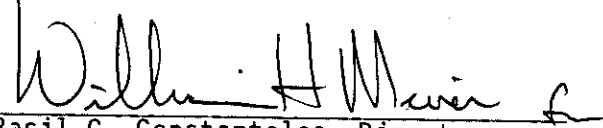
Agreed this 13th day of November, 1987.

RB & W Corporation, Respondent

By 

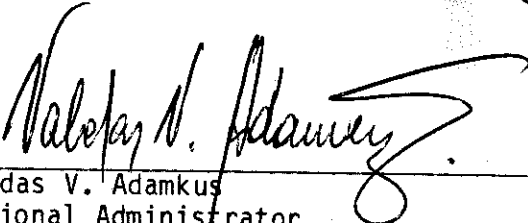
Title President and CEO

Agreed this 30th day of November, 1987.


Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ORDERED

this 3rd day of December, 1987.


Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

NOV 30 1987

MEMORANDUM

SUBJECT: RB&W Corporation
Docket No. RCRA-V-W-87-R-040

FROM: Robert B. Schaefer and Basil G. Constantelos
Regional Counsel Director, Waste Management Division

TO: Valdas V. Adamkus
Regional Administrator

Please find attached a copy of a Consent Agreement and Final Order for your review and signature to resolve the above referenced matter.

The Respondent has agreed to comply with all of the applicable requirements under the Resource Conservation and Recovery Act. The proposed total penalty for violations of provisions of the Resource Conservation and Recovery Act was \$59,875. Respondent was cited for improperly storing hazardous wastes and for inadequate employee training and contingency plans. The largest component of this penalty was the \$22,500 assessed for failure to maintain containers of hazardous waste in good condition. Respondent presented evidence that the containers in question did not contain hazardous wastes, justifying a reduction in the penalty to \$35,000.

WEM
Act. SWB
11/24/87

WMS
Act. SWB
11/27/87

11/27/87

11/27/87

MES for RBS 11/22
11/27/87

SRA
12/4/87

P. S. D
11-27-87

EP 11-30-87

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

STAFF ATTORNEY

SEC. CHIEF

BRANCH CHIEF

DEPUTY REG. COUNSEL

REGIONAL COUNSEL

OTHER

OTHER

DOCKET No.: V-W-87-R-40

CONSENT AGREEMENT AND
FINAL ORDER

IN THE MATTER OF:

RB & W CORPORATION
800 MOGADORE ROAD
KENT, OHIO 44240

EPA I.D. No.: OHD 004 196 614

On April 9, 1987, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA), 42 U.S.C. §6928, and the United States Environmental Protection Agency's (U.S. EPA) Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, U.S. EPA. The Respondent is RB & W Corporation.

The Parties to this action being desirous to settle this action enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Order (Docket No. V-W-87-R-40) in this matter;
2. The Regional Administrator has jurisdiction over this matter pursuant to Section 3008 of RCRA, 42 U.S.C. §6928;
3. Respondent operates a facility located at 800 Mogadore Road, Kent, Ohio 44240;
4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint;
5. Respondent explicitly waives its right to request a hearing regarding the allegations contained in the Complaint;

6. Respondent consents to the issuance of the Order hereinafter recited, and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated; and
7. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Order in this matter:

- A. Respondent shall, within five (5) days of the effective date of this Order, submit a certification stating that hazardous waste is no longer being generated or stored at the facility and that all previously generated and stored hazardous waste has been properly disposed. Copies of supporting manifests should accompany the certification. The U.S. EPA/Ohio Environmental Protection Agency reserves the right to perform an inspection to determine compliance with this paragraph.
- B. Respondent shall, within thirty (30) days of the effective date of this Order, submit a closure plan, prepared in accordance with the requirements contained in 40 CFR 265.112 and 265.179, which describes how and when the tank and drum storage areas were closed. Respondent shall also submit a certification of closure pursuant to 40 CFR 265.115.
- C. Respondent shall pay a civil penalty in the amount of THIRTY-FIVE THOUSAND DOLLARS (\$35,000), payable to the Treasurer of the United States of America within thirty (30) days of the effective date of this Order. Said payment shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should also be sent to both the Regional

Hearing Clerk, Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, 111 West Jackson Boulevard, Chicago, Illinois 60604.

D. The U.S. EPA may collect interest on any amounts overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on a late payment. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.

E. Respondent shall notify U.S. EPA in writing within fifteen (15) business days upon achieving compliance with this Order. This notification shall be submitted to Mr. Paul Dimock, U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Section. A copy of these documents shall also be submitted to Michael Savage, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of the Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

The above Consent Agreement and Final Order consisting of 4 pages is hereby consented to by both of the parties to this proceeding.

Agreed this 13th day of November, 1987.

RB & W Corporation, Respondent

By

[Signature]

Title President and CEO

Agreed this _____ day of _____, 1987.

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ORDERED

this _____ day of _____, 1987.

Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

04 DEC 1987

5CS-TUB-3

Honorable J.F. Greene
Office of Administrative Law Judges (A-110)
U.S. Environmental Protection Agency
401 N Street S.W.
Washington, D.C. 20460

Re: RB&W Corporation
Docket No. RCRA-V-W-87-R-040

Dear Judge Greene:

In response to your order dated November 17, 1987, the defendant has signed the Consent Agreement and Final Order and it is currently in sign-off at U.S. EPA.

Respectfully submitted,

Thea D. Dunmire
Assistant Regional Counsel

cc. Mark I. Wallach, Esq.
Attorney for Respondent

Beverly Shorty
Regional Hearing Clerk

bcc: Lynn Peterson
Paul Dimock, 5HE-12

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

DATE: November 23, 1987

SUBJECT: RB&W CAFO

FROM: Thea Dunmire

TPD

TO: Paul Dimmock

Enclosed find 2 executed copies of the CAFO sent to me by Mark Wallach. Please start it thru sign-off. I'd like to get sign-off completed next week because I have to send another status report to the ALJ by the end of next week.

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166

Telex 980499

November 19, 1987

Thea Dunmire
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Re: RB&W Corporation, RCRA
Docket No. V-W-87 R-040

Dear Ms. Dunmire:

Enclosed are two executed originals of the Consent Agreement and Final Order in the above-captioned matter. Of course, this agreement is subject to the clarification described in my letter to you of October 23, 1987.

Please let me know when this agreement has been approved and signed by the appropriate government officials.

Thank you for your assistance in this matter.

Very truly yours,



Mark I. Wallach

MIW: fmm

Enclosures

cc - Paul Dimock



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5CS-TUB-3

NOV 13 1987

Honorable J.F. Greene
Office of Administrative Law Judges (A-110)
U.S. Environmental Protection Agency
401 N Street S.W.
Washington, D.C. 20460

Re: RB&W Corporation
Docket No. RCRA-V-W-87-R-040

Dear Judge Greene:

In response to your order dated October 22, 1987, counsel for the defendant has informed me that the last Consent Agreement and Final Order prepared by U.S. EPA is currently being circulated for signature at RB&W.

Respectfully submitted,

Thea D. Dunmire

Thea D. Dunmire
Assistant Regional Counsel

cc: Mark I. Wallach, Esq.
Attorney for Respondent

Beverly Shorty
Regional Hearing Clerk

RCRA CONSENT AGREEMENT AND FINAL ORDER SIGN-OFF

Needs to be signed by 12/2 → prior to next status report being due.

PART I BACKGROUND

Facility Name RB & W CORPORATION
 Facility RCRA ID Number OHJ 004 196 614
 Docket Number V-W-87-R-40
 RES Assignee P DIMOCK ORC Assignee T. DUNMIRE
 Summary of Agreement Compliance w/ applicable reg.
Assess and payment of \$35,000 Penalty

PART II CONCURRENCES ON DRAFT CAFO

	Initials	Date	Agree	Disagree
RES Assignee	<u>P.S.N</u>	<u>7-16-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Unit	<u>YDB</u>	<u>7-22-87</u> <u>7-17-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Sect.	<u>WEM</u>	<u>7-21-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asst. Regional Counsel	<u>JD</u>	<u>7-16-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Sect.	<u>Em</u>	<u>7-16-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

with changes with changes

PART III RETURN TO ORC ASSIGNEE FOR TRANSMITTAL OF DRAFT TO THE FACILITY

PART IV FINAL CAFO APPROVAL

RES Assignee	<u>P.S.N</u>	<u>11-27-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Unit	<u>P.S.N</u>	<u>11-23-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Sect.	<u>WEM</u>	<u>11-24-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, HWB Act.	<u>WEM</u>	<u>11-24-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asst. Regional Counsel	<u>TOD</u>	<u>11/27/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Sect.	<u>JP</u>	<u>11/27/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Branch	<u>_____</u>	<u>_____</u>	<input type="checkbox"/>	<input type="checkbox"/>
Deputy, Regional Counsel	<u>_____</u>	<u>_____</u>	<input type="checkbox"/>	<input type="checkbox"/>
Regional Counsel	<u>NBS</u>	<u>11/27</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Director, WMD	<u>WEM</u>	<u>_____</u>	<input type="checkbox"/>	<input type="checkbox"/>
Regional Administrator	<u>_____</u>	<u>_____</u>	<input type="checkbox"/>	<input type="checkbox"/>

NA. under streamlined sign-off

Return to T. Dunmire.

PART V RETURN TO D. REAPE, 5HE-12, FOR MAILING

COPY SENT TO
RBW 10-7-87

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

RB & W CORPORATION
800 MOGADORE ROAD
KENT, OHIO 44240

EPA I.D. No.: OHD 004 196 614

DOCKET No.: V-W-87-R-40

CONSENT AGREEMENT AND
FINAL ORDER

On April 9, 1987, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA), 42 U.S.C. §6928, and the United States Environmental Protection Agency's (U.S. EPA) Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, U.S. EPA. The Respondent is RB & W Corporation.

The Parties to this action being desirous to settle this action enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Order (Docket No. V-W-87-R-40) in this matter;
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3. Respondent operates a facility located at 800 Mogadore Road, Kent, Ohio 44240;
4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint;
5. Respondent explicitly waives its right to request a hearing regarding the allegations contained in the Complaint;

6. Respondent consents to the issuance of the Order hereinafter recited, and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated; and
7. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

ORDER

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- B. Respondent shall, within thirty (30) days of the effective date of this Order, submit a closure plan, prepared in accordance with the requirements contained in 40 CFR 265.112 and 265.179, which describes how and when the tank and drum storage areas were closed. Respondent shall also submit a certification of closure pursuant to 40 CFR 265.115.
- C. Respondent shall pay a civil penalty in the amount of THIRTY-FIVE THOUSAND DOLLARS (\$35,000), payable to the Treasurer of the United States of America within thirty (30) days of the effective date of this Order. Said payment shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should also be sent to both the Regional

Hearing Clerk, Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, 111 West Jackson Boulevard, Chicago, Illinois 60604.

D. The U.S. EPA may collect interest on any amounts overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on a late payment. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.

E. Respondent shall notify U.S. EPA in writing within fifteen (15) business days upon achieving compliance with this Order. This notification shall be submitted to Mr. Paul Dimock, U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Section. A copy of these documents shall also be submitted to Michael Savage, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of the Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

The above Consent Agreement and Final Order consisting of 4 pages is hereby consented to by both of the parties to this proceeding.

Agreed this _____ day of _____, 1987.

RB & W Corporation, Respondent

By _____

Title _____

Agreed this _____ day of _____, 1987.

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ORDERED

this _____ day of _____, 1987.

Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5CS-TUB-3

Honorable J.F. Greene
Office of Administrative Law Judges (A-110)
U.S. Environmental Protection Agency
401 N Street S.W.
Washington, D.C. 20460

Re: RB&W Corporation
Docket No. RCRA-V-W-87-R-040

Dear Judge Greene:

To update you on the status of this case per your order dated September 29, 1987, the parties have reached tentative agreement regarding both the technical issues and the amount of the penalty. A Consent Agreement and Final Order has been prepared and sent to the respondent for signature.

Respectfully submitted,

Thea D Dunmire

Thea D. Dunmire
Assistant Regional Counsel

cc: Mark I. Wallach, Esq.
Attorney for Respondent

Beverly Shorty
Regional Hearing Clerk

10 OCT 1987

Mr. Mark I. Wallach
Cafree, Halter & Griswold
1800 Society Building
Cleveland, Ohio 44114-2688

Re: RB&W Corporation
Docket NO. V-W-87-R-040

Dear Mr. Wallach:

Enclosed please find a Consent Agreement and Final Order (CAFO) which reflects the terms we have negotiated to date. Please review the CAFO and if it is acceptable, have the two originals signed by the appropriate party or parties.

Upon the approval of upper management, the United States Environmental Protection Agency will sign both documents and return one to you.

Sincerely,

Thea D. Dunmire
Assistant Regional Counsel

Enclosure

bcc: Paul E. Dimock (5HE-12)

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166
Telex 980499

September 18, 1987

RECEIVED
SEP 21 1987
U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Paul E. Dimock
RCRA Enforcement Section
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Re: RB&W Corporation,
Docket No. V-W-87 R-040

Dear Paul:

Enclosed are the manifests and other documentation relating to the disposal of the process liquids from the plating lines at RB&W Corporation.

I understand that the sludges will be removed from the hazardous waste storage area sometime next week. As soon as I receive the documentation for that removal, I will forward it to you.

We look forward to reviewing the next draft of your proposed Consent Agreement.

Very truly yours,



Mark I. Wallach

MIW: fmm

Enclosures

REPORT ANY UNRECOVERED DIS-
CHARGE EQUAL TO OR IN EXCESS OF
EACH HAZARDOUS WASTE ASSIGNED
"RQ" VALUE TO NATIONAL RESPONSE
CENTER
800-424-8802

REPORTABLE QUANTITY VALUE
2's - 5000/1000/100/10/1

a. RQ =
b. RQ =

c. RQ =
d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PLACARDS
PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240		6. US EPA ID Number 01 H1 D1 01 01 41 11 91 61 61 11 41 01 01 11 51 41		A. State Manifest Document Number		B. State Generator's ID			
4. Generator's Phone (216) 673-3446		7. Transporter 1 Company Name ALCHEM-TRON INC.		8. US EPA ID Number 01 H1 D1 01 71 71 71 81 61 31 01 91		C. State Transporter's ID		D. Transporter's Phone	
5. Transporter 2 Company Name		9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127		10. US EPA ID Number 01 H1 D1 91 81 01 51 61 91 41 31 81		E. State Transporter's ID		F. Transporter's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. #1 OIL SWEEPINGS NON-HAZARDOUS		CPW 0 0 1 D M		110		G		N/A	
b. #2 BONDERITE-WASTE CORROSIVE LIQUID COR. UN 1760		✓ 1 4 D M		720		G		D002	
c. #3 SOAK CLEANER WASTE NON-HAZARDOUS		✓ 0 0 4 D M		220		G		N/A	
d. #4 PHOSPHATE-HAZARDOUS WASTE SOLID ORM-E UN 9189		CPW 0 1 1 D M		275		G		D006	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above T21-45 T4-45 T21-45 T21-45					
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name NICK P. GEORGE				Signature "On behalf of" Carl P. Wohlwend				Month Day Year 10/4/11/6/8/7	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name E. W. Freck				Signature E. W. Freck	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name				Signature	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									
Printed/Typed Name P. SINGH				Signature P. Singh For Alch-Tron				Month Day Year 04/16/87	

AT ANY UNRECOVERED DIS- CHARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300	PLACARDS PROVIDED
	RQ =	c. RQ =	EPA HOTLIN. = 800-424-9346	
	b. RQ =	d. RQ =	CDC POISON CENTER = 404-635-5313	
			DOT = 202-426-1830	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 01HD01014191611401011514	Manifest Document No. 4	2. Page 1 2 of 2	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240				A. State Manifest Document Number	
4. Generator's Phone (216) 673-3446				B. State Generator's ID	
5. Transporter 1 Company Name ALCHEM-TRON INC.		6. US EPA ID Number 01HD0177786309		C. State Transporter's ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone	
9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127		10. US EPA ID Number 01HD980569438		E. State Transporter's ID	
				F. Transporter's Phone	
				G. State Facility's ID	
				H. Facility's Phone 216-441-5628	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. #5 ULTRA SOLVENT-ORM-A WASTE TRICHTHORETHANE - UN 2831			00 DM	165	G F001
b. #6 PICKLE FINE BOTTOM OF TANK NON-HAZARDOUS			00 DM	275 110	G N/A
c. #7 HYDROCHLORIC ACID - COR WASTE CORROSIVE LIQUID - UN 1760			001 DM	55	G D002
d.					
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above T50-63 TA TA	
15. Special Handling Instructions and Additional Information					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name NICK P. GEORGE		Signature "On behalf of" CARL P. WOLLWEIND		Month Day Year 04/16/87	
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name E.W. FROCK		Signature E.W. Frock	
				Month Day Year 04/16/87	
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature	
				Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name P. SINGH		Signature P. Singh For Alch-Tron		Month Day Year 04/16/87	

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.
OHD004196614

Manifest Document No.
1 16720

2. Page 1
of 1

Information in the shaded areas
is not required by Federal law.

3. Generator's Name and Mailing Address

R.B.&W. CORP.
800 Mogadore Road, Kent, OH 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name
ENVIRITE CORPORATION

6. US EPA ID Number
OHD980568992

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

Envirite Corporation
2050 Central Ave., S.E.
Canton, OH 44707

10. US EPA ID Number

OHD980568992

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 216-456-6238

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

216-456-6238

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)

a. ☒ WASTE CYANIDE LIQUID NOS
F007, UN1935 POISON B

12. Containers
No. Type

001 TT

13. Total
Quantity

1480

14. Unit
Wt/Vol

G

1. Waste No.

F007-

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name

R.A. THOMAS

Signature

R.A. Thomas

Month Day Year

8 25 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

TEDDY J SEERY

Signature

Teddy J Seery

Month Day Year

08 25 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Michael C. Furst

Signature

Michael C. Furst

Month Day Year

8 25 87

RECOVERED DIS-
POS OR IN EXCESS OF
HAZARDOUS WASTE ASSIGNED
TO NATIONAL RESPONSE

800-424-8802

REPORTABLE QUANTITIES
RQ's - 5000/1000/100/10/1

a. RQ = c. RQ =
b. RQ = d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PLACARDS
PROVIDED

or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1. Generator's US EPA ID No.

Manifest
Document No.

2. Page 1

1 of 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

RB& W CORPORATION
800 MOGADORE ROAD, KENT, OHIO 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name

ENVIRITE CORPORATION

7. Transporter 2 Company Name

9. Designated Facility Name and Site Address

ENVIRITE CORPORATION
2050 CENTRAL AVE. S. E.,
CANTON, OHIO 44707

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. SPENT SULFURIC ACID PICKLE - UN1832
LIQUOR (RQ 1000/454) UNIQUE CORROSIVE MAT. 0062

b. K062

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

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Printed/Typed Name
NICK P. GEORGE

Signature "On behalf of"

Month Day Year
6 13 01 87

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Randy Gehring

Signature

Randy Gehring

Month Day Year
6 13 01 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

DON GRITZINGER

Signature

Don Gritzinger

Month Day Year
6 15 01 87

UNRECOVERED DIS- EQUAL TO OR IN EXCESS OF HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300	PLACARDS PROVIDED
	a. RQ =	c. RQ =	EPA HOTLINE = 800-424-9346	
	b. RQ =	d. RQ =	CDC POISON CENTER = 404-635-6313	
			DOT = 202-426-1830	

Form Approved. OMB No. 2050-0039. Expires 9-30-88

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

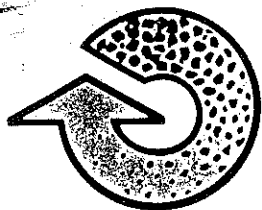
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D 0 0 4 1 9 6 6 1 4 0 0 1 3	Manifest Document No. 3	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240			A. State Manifest Document Number		
4. Generator's Phone (216) 673-3446			B. State Generator's ID		
5. Transporter 1 Company Name ENVIRITE CORPORATION			C. State Transporter's ID 52234-HW		
6. US EPA ID Number OH D 9 8 0 5 6 8 9 9 2			D. Transporter's Phone 456-6238		
7. Transporter 2 Company Name			E. State Transporter's ID		
8. US EPA ID Number			F. Transporter's Phone		
9. Designated Facility Name and Site Address ENVIRITE CORPORATION 2050 CENTRAL AVENUE, S.E., CANTON, OHIO 44707			G. State Facility's ID		
10. US EPA ID Number OH D 9 8 0 5 6 8 9 9 2			H. Facility's Phone (216) 456-6238		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol
a. SPENT SULFURIC ACID PICKLE LIQUOR (RQ 1000/454) UN1832 CORROSIVE MATERIAL (2) K062		01	01	1	TT 2724 G K062
b.					
c.					
d.					
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information					
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Printed/Typed Name NICK P. GEORGE		Signature <i>Nick P. George</i>		Month Day Year 03 3 4 8 7	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature <i>Randy Gehring</i>		Month Day Year 03 3 1 8 7	
Printed/Typed Name Randy Gehring		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name DON GRITZINGER		Signature <i>Don Gritzinger</i>		Month Day Year 03 3 1 8 7	

HAZARDOUS WASTE ASSIGNED RQ VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300	PLACARDS PROVIDED
	a. RQ =	c. RQ =	EPA HOTLINE = 800-424-9346	
	b. RQ =	d. RQ =	CDC POISON CENTER = 404-635-5313	
			DOT = 202-426-1830	

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 01 H D 01 01 41 91 61 61 11 41 01 01 50		Manifest Document No. 50		2. Page 1 1 of 1		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address R B & W CORPORATION 800 MOAGADORE ROAD, KENT, OHIO 44240						A. State Manifest Document Number											
4. Generator's Phone (216) 673-3446						B. State Generator's ID											
5. Transporter 1 Company Name ENVIRITE CORPORATION				6. US EPA ID Number 01 H D 91 81 01 51 61 81 91 91 21		C. State Transporter's ID 52234-HW											
7. Transporter 2 Company Name				8. US EPA ID Number		D. Transporter's Phone 456-6238											
9. Designated Facility Name and Site Address ENVIRITE CORPORATION 2050 CENTRAL AVENUE S. E. CANTON, OHIO 44707						10. US EPA ID Number 01 H D 91 81 01 51 61 81 91 91 21											
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt./Vol		15. Waste No.					
a. SPENT SULFURIC ACID PICKLE LIQUOR (RQ 1000/454) UN1832 CORROSIVE MATERIAL (2) (K062)						0 0 1 1 1		5,169 G		K062							
b.																	
c.																	
d.																	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above											
15. Special Handling Instructions and Additional Information																	
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Printed/Typed Name DON P. GRITZINGER						Signature "On behalf of" ME Arthur Milby				Month Day Year 05 22 87							
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name KEITH WITTHIECH						Signature Keith Witthiech				Month Day Year 05 22 87							
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature				Month Day Year							
19. Discrepancy Indication Space																	
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name DON GRITZINGER										Signature Don Gritzinger				Month Day Year 05 22 87			



ENVIRITE CORPORATION

TECHNOLOGY FOR THE ENVIRONMENT

March 19, 1987

Nick George
R. B. & W. Corporation
800 Mogadore Road
Kent, Ohio 44240

RE: DISPOSAL OF YOUR HAZARDOUS WASTE

Please find enclosed Envirite's non-hazardous certification for your waste stream:

Spent Sulfuric Acid

This certificate may be used to show that this waste stream has been rendered non-hazardous by Envirite's delisted process. At this point, your RCRA hazardous waste liabilities for this waste material are ended.

We suggest you file this document with your hazardous waste manifest.

Thank you for your concern in wishing to properly dispose of your waste solution in an environmentally sound manner.

Sincerely yours,

William P. Devan
Sales Manager

WPD:dcb

Enclosure(s)

NONHAZARDOUS CERTIFICATION

This is to certify that sulfuric acid waste received 3/31/87
from R B & W CORP. on manifest
00153 has been rendered nonhazardous in full compliance with
the terms of Envirite Corporation's delisting petition granted by the U.S. EPA
November 6, 1986.

Having changed this hazardous waste into a nonhazardous material, Envirite
Corporation has eliminated all R B & W Corp.'s future hazardous
waste liability for this material under RCRA (Resource Conservation and Recovery
Act of 1976).


Geoffrey Stengel, Jr.
President


Operations Manager

ENVIRITE
Corporate Headquarters
Plymouth Meeting, Pennsylvania 19462

a/18/87
rv rsw

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

RB & W CORPORATION
800 MOGADORE ROAD
KENT, OHIO 44240

EPA I.D. No.: OHD 004 196 614

)
) DOCKET No.: V-W-87-R-40
)

) CONSENT AGREEMENT AND
) FINAL ORDER
)

On April 9, 1987, a Complaint was filed in this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended, (RCRA), 42 U.S.C. §6928, and the United States Environmental Protection Agency's (U.S. EPA) Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, U.S. EPA. The Respondent is RB & W Corporation.

The Parties to this action being desirous to settle this action enter into the following stipulations:

1. Respondent has been served with a copy of the Complaint, Findings of Violation, and Order (Docket No. V-W-87-R-40) in this matter;
2. The Regional Administrator has jurisdiction over this matter pursuant to Section 3008 of RCRA, 42 U.S.C. §6928;
3. Respondent operates a facility located at 800 Mogadore Road, Kent, Ohio 44240;
4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint;
5. Respondent explicitly waives its right to request a hearing regarding the allegations contained in the Complaint;

6. Respondent consents to the issuance of the Order hereinafter recited, and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated; and
7. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

ORDER

Based on the foregoing stipulations, the Parties agree to the entry of the following Order in this matter:

- A. Respondent shall, within five (5) days of the effective date of this Order, submit a certification stating that hazardous waste is no longer being generated or stored at the facility and that all previously generated and stored hazardous waste has been properly disposed. Copies of supporting manifests should accompany the certification. The U.S. EPA/Ohio Environmental Protection Agency reserves the right to perform an inspection to determine compliance with this paragraph.
- B. Respondent shall, within thirty (30) days of the effective date of this Order, submit a closure plan, prepared in accordance with the requirements contained in 40 CFR 265.112 and 265.179, which describes how and when the tank and drum storage areas were closed. Respondent shall also submit a certification of closure pursuant to 40 CFR 265.115.
- C. Respondent shall pay a civil penalty in the amount of FORTY-FIVE THOUSAND DOLLARS (\$45,000), payable to the Treasurer of the United States of America within thirty (30) days of the effective date of this Order. Said payment shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should also be sent to both the Regional

Hearing Clerk, Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, 111 West Jackson Boulevard, Chicago, Illinois 60604.

D. The U.S. EPA may collect interest on any amounts overdue under the terms of this Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment handling charge of \$20.00 will be imposed on a late payment. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date on which each payment is due.

E. Respondent shall notify U.S. EPA in writing within fifteen (15) business days upon achieving compliance with this Order. This notification shall be submitted to Mr. Paul Dimock, U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Section. A copy of these documents shall also be submitted to Michael Savage, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, 1800 WaterMark Drive, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of the Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

The above Consent Agreement and Final Order consisting of 4 pages is hereby consented to by both of the parties to this proceeding.

Agreed this _____ day of _____, 1987.

RB & W Corporation, Respondent

By _____

Title _____

Agreed this _____ day of _____, 1987.

Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ORDERED

this _____ day of _____, 1987.

Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

5HE-12

SEP 11 1987

Mr. Mark Wallach
Calfee, Halter & Griswold
Attorneys At Law
1800 Society Building
Cleveland, Ohio 44114-2688

Re: RB & W Corporation
Docket No.: V-W-87-R-040

Dear Mr. Wallach:

This is to confirm in writing our telephone request of September 8, 1987, for additional information concerning RB & W Corporation. Specifically, we asked for documentation of the removal and final disposition of the CAD plating line solution, including any associated sludges. Also, we would like to know the status of the CAD plating line equipment. We understand that RB & W Corporation was trying to sell this equipment.

We believe that substantial progress has been made towards settlement of this case and suggest that a conference call be held with you and your client to further discuss settlement. We have set aside the morning of Wednesday, September 16, 1987, for this purpose.

Please contact me at (312) 886-4436, so that a definite time can be set if this date is convenient for you, or an alternate date be established if it is not convenient.

Sincerely,

Paul E. Dimock
RCRA Enforcement Section

bcc: James Brossman
Thea Dunmire, ORC

mt 9/11/87

5HE-12	PDIMOCK: Fharris: 6	OTHER STAFF	6: 9/11/87	SECT. SEC'Y	SECT. CHIEF	HWER CHIEF	WARD DIR
INT. DATE	9/11/87	P.E.D. 9/11/87	PD 9/11/87				

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166

Telex 980499

July 31, 1987

Thea Dunmire
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Re: RB&W Corporation, RCRA
Docket No. V-W-87 R-040

Dear Ms. Dunmire:

I have had an opportunity to review your proposed Consent Agreement and Final Order with my client, and can make the following responses. Several of the subsections of paragraph B of the proposed Order, as I have previously discussed with you, appear to be moot. In particular, paragraphs 3 and 4 do not appear to be necessary, in view of the discontinuation of generation and storage of hazardous wastes by RB&W. In addition, while RB&W has no objection to complying with the requirements of proposed subparagraph 6, the 30 days provided is probably not adequate; I would suggest 90 days as a more appropriate period.

In addition, as we have previously discussed, the proposed civil penalty is excessive and not agreeable to RB&W. We remain willing to pay a civil penalty in the amount of \$30,000, as was previously offered.

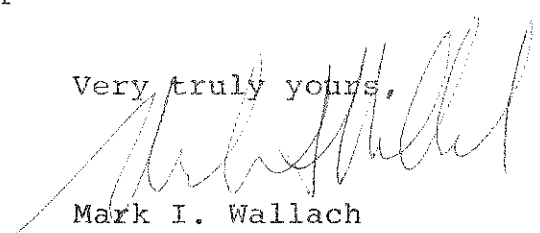
If U.S. EPA is willing to execute a Consent Agreement and Final Order with the modifications discussed above,

Calfee, Halter & Griswold

Linda M. Bullen, Esq.
May 29, 1987
Page 2

RB&W will be happy to bring this matter to a close. Please let me know your response to these comments as soon as possible.

Very truly yours,



Mark I. Wallach

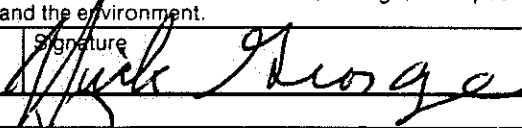
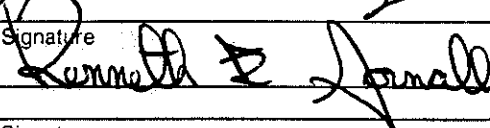
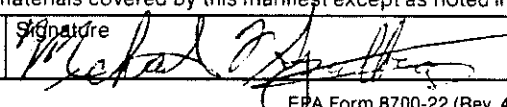
MIW: fmm

EQUAL TO OR IN EXCESS OF HAZARDOUS WASTE ASSIGNED VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	a. RQ = b. RQ =	c. RQ = d. RQ =	CHEM TREC EPA HOTLINE CDC POISON CENTER DOT	= 800-424-9300 = 800-424-9346 = 404-635-5313 = 202-426-1830	PLACARDS PROVIDED
---	--------------------	--------------------	--	--	----------------------

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH 10106 14119 6 61114 0 0 75		Manifest Document No. 26		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB& W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240 4. Generator's Phone (216) 673-3446				5. Transporter 1 Company Name ENVIRITE CORPORATION		6. US EPA ID Number 101H D98 0151618 0 92		A. State Manifest Document Number	
7. Transporter 2 Company Name ENVIRITE CORPORATION 2050 CENTRAL AVE. S. E., CANTON, OHIO 44707				8. US EPA ID Number 101H D 981 056 B 91012		9. Designated Facility Name and Site Address		C. State Transporter's ID D. Transporter's Phone E. State Transporter's ID F. Transporter's Phone G. State Facility's ID H. Facility's Phone	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. SPENT SULFURIC ACID PICKLE - UN 1832 LIQUOR (RQ 1000/454) UNIQUE CORROSIVE MAT. K062				12. Containers No. Type 0 0 1 T T		13. Total Quantity 00654		14. Unit Wt/Vol G	
b. K062				15. Waste No. K062					
c.									
d.									
Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above					
15. Special Handling Instructions and Additional Information									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name NICK P. GEORGE				Signature "On behalf of" 				Month Day Year 6 30 87	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Randy Gehring				Signature 				Month Day Year 6 30 87	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature				Month Day Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name DON GRITZINGER									
Signature 				Month Day Year 6 15 87					

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D0041966141 0016		Manifest Document No. 0016		2. Page 1 of Information in the shaded areas is not required by Federal law.																																																										
		3. Generator's Name and Mailing Address P.B. & W. 800 Mogadore Road Kent, Ohio 44240		A. State Manifest Document Number		B. State Generator's ID																																																										
4. Generator's Phone (216) 673-3446 Mr. Nick George		5. Transporter 1 Company Name USPCI		6. US EPA ID Number 10KD981514474		C. State Transporter's ID																																																										
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (405) 324-5011		E. State Transporter's ID																																																										
9. Designated Facility Name and Site Address P.P.M. Inc 4105 Whitaker Ave Philadelphia PA 19124		10. US EPA ID Number 1PAD981113749		F. Transporter's Phone		G. State Facility's ID																																																										
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="width:5%;">a.</th> <th style="width:5%;">b.</th> <th style="width:5%;">c.</th> <th style="width:5%;">d.</th> <th style="width:10%;">HM</th> <th style="width:45%;">Description</th> <th style="width:5%;">12. Containers No.</th> <th style="width:5%;">12. Containers Type</th> <th style="width:10%;">13. Total Quantity</th> <th style="width:5%;">14. Unit Wt/Vol</th> <th style="width:10%;">15. Waste No.</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>WASTE HAZARDOUS substance Liquid NOS ORM-E NA4188 (Polychlorinated Biphenyls) RQ (10/4.54) EPA - EP TOXIC (oil)</td> <td>1</td> <td>II</td> <td>725</td> <td>G</td> <td></td> </tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>		a.	b.	c.	d.	HM	Description	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.					X	WASTE HAZARDOUS substance Liquid NOS ORM-E NA4188 (Polychlorinated Biphenyls) RQ (10/4.54) EPA - EP TOXIC (oil)	1	II	725	G																																			12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
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J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above																																																										
15. Special Handling Instructions and Additional Information Dike AND CONTAIN IN CASE OF spill <div style="text-align: right;">ReFill # 7003406</div>																																																																
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.																																																																
Printed/Typed Name Nick George						Signature 			Month Day Year 17 16 87																																																							
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Kenneth E Gornall						Signature 			Month Day Year 17 16 87																																																							
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature			Month Day Year																																																							
19. Discrepancy Indication Space 749 Total gallons																																																																
Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.																																																																
Printed/Typed Name Michael F. Spielberg						Signature 			Month Day Year 07 17 87																																																							

EQUAL TO OR IN EXCESS OF
HAZARDOUS WASTE ASSIGNED
VALUE TO NATIONAL RESPONSE
CENTER
800-424-8802

RQ's - 5000/1000/100/10/1
a. RQ =
b. RQ =
c. RQ =
d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address		R B & W CORPORATION 800 MOAGADORE ROAD, KENT, OHIO 44240			A. State Manifest Document Number			
4. Generator's Phone (216) 673-3446					B. State Generator's ID			
5. Transporter 1 Company Name		6. US EPA ID Number			C. State Transporter's ID			
ENVIRITE CORPORATION		OH D 9 8 0 5 6 8 9 9 2			52234-HW			
7. Transporter 2 Company Name		8. US EPA ID Number			D. Transporter's Phone			
					456-6238			
9. Designated Facility Name and Site Address		10. US EPA ID Number			E. State Transporter's ID			
ENVIRITE CORPORATION								
2050 CENTRAL AVENUE S. E.					F. Transporter's Phone			
CANTON, OHIO 44707		OH D 9 8 0 5 6 8 9 9 2			G. State Facility's ID			
					H. Facility's Phone			
					216-456-6238			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.		
a. SPENT SULFURIC ACID PICKLE LIQUOR (RQ 1000/454) UN1832 CORROSIVE MATERIAL (2)		No. Type						
(K062)		D D 1 T T		5,169	G	K062		
b.								
c.								
d.								
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above						
2 MAY 87 3:52		[Stamps: RECEIVED, MAY 11 1987, etc.]						
15. Special Handling Instructions and Additional Information								
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Printed/Typed Name				Signature "On behalf of"		Month Day Year		
MCK P. GEORGE				McArthur Milby		105 2 2 87		
17. Transporter 1 Acknowledgement of Receipt of Materials								
Printed/Typed Name				Signature		Month Day Year		
KEITH WITHEICH				Keith Witheich		105 2 2 87		
18. Transporter 2 Acknowledgement of Receipt of Materials								
Printed/Typed Name				Signature		Month Day Year		
19. Discrepancy Indication Space								
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.								
Printed/Typed Name				Signature		Month Day Year		
DON GRITZINGER				Don Gritzing		05 22 87		

REPORT ANY UNRECOVERED DIS-
CHARGE EQUAL TO OR IN EXCESS OF
EACH HAZARDOUS WASTE ASSIGNED
"RQ" VALUE TO NATIONAL RESPONSE
CENTER
800-424-8802

REPORTABLE QUANTITY VALUE
RQ's - 5000/1000/100/10/1
a. RQ =
b. RQ =
c. RQ =
d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PROVIDED

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Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240		01H1010411966114001154		1 of 2		
4. Generator's Phone (216) 673-3446		6. US EPA ID Number		A. State Manifest Document Number		
5. Transporter 1 Company Name ALCHEM-TRON INC.		101H101077786309		B. State Generator's ID		
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Transporter's ID		
9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127		10. US EPA ID Number		D. Transporter's Phone		
				E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone 216-441-5628		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. #1 OIL SWEEPINGS NON-HAZARDOUS		No. Type 001 DM	110	G	N/A	
b. #2 BONDERITE-WASTE CORROSIVE LIQUID COR. UN 1760		14 DM	770	G	DQ02	
c. #3 SOAK CLEANER WASTE NON-HAZARDOUS		004 DM	220	G	N/A	
d. #4 PHOSPHATE-HAZARDOUS WASTE SOLID ORM-E UN 9189		011 DM	275	G	D006	
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above T21-45 T4-45 T21-45 T21-45				
15. Special Handling Instructions and Additional Information						
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Printed/Typed Name NICK P. GEORGE		Signature "On behalf of" Carl P. Wohlwend		Month Day Year 10/4/16/87		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature E.W. Frack		Month Day Year 02/11/87		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name P. SINGH		Signature P. Singh For Alch-Tron		Month Day Year 04/16/87		

RECEIVED

DEC 16 1987

MIW

RB&W

ERNEST W. GEAR
PLANT MANAGER

December 14, 1987

CAFO Order A

U.S. E.P.A.
Region 5
230 South Dearborn St.
Chicago, Illinois 60604

Attn: Mr. William H. Miner, Chief
Hazardous Waste Enforcement Branch

Dear Sir:

We submit this letter in accordance with docket V-W-87-R-040
number A.

To the best of our knowledge we certify that hazardous waste
is no longer being generated or stored at our facility and that all
previously generated and stored hazardous wastes have been properly
disposed. Attached are copies of supporting manifest.

Sincerely,

Ernest Gear

Ernest Gear
Kent Plant Manager

attachments

cc: Calfee, Halter & Griswold
Attorneys At Law

EG/cr

RECEIVED
U.S. E.P.A. REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OHD004196614		Manifest Document No. 16770		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
		3. Generator's Name and Mailing Address R.B.&W. CORP. 800 Mogadore Road, Kent, OH 44240		6. US EPA ID Number OHD980568992		C. State Transporter's ID 52234		D. Transporter's Phone 216-456-6238					
4. Generator's Phone (216) 673-3446		7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone					
9. Designated Facility Name and Site Address Envirite Corporation 2050 Central Ave., S.E. Canton, OH 44707		10. US EPA ID Number OHD980568992		G. State Facility's ID		H. Facility's Phone 216-456-6238							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol					
				No. Type						Waste No.			
				a. <input checked="" type="checkbox"/> WASTE CYANIDE LIQUID NOS F007, UN1935 POISON B		001 TT		1480		G		F007-	
				b.									
				c.									
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
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Printed/Typed Name R.A. THOMAS						Signature R.A. Thomas		Month Day Year 8 25 87					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name TEDDY J SEERY						Signature Teddy J Seery		Month Day Year 08 25 87					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature		Month Day Year					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Michael C. Furst						Signature Michael C. Furst		Month Day Year 8 25 87					

IF ANY UNRECOVERED DIS- CHARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1		CHEM TREC = 800-424-9300 EPA HOTLINE = 800-424-9346 CDC POISON CENTER = 404-635-5313 DOT = 202-426-1830	PLACARDS PROVIDED
	a. RQ =	c. RQ =		
	b. RQ =	d. RQ =		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 0 H D 0 0 4 1 9 6 6 1 4 0 0 1 5 4		Manifest Document No. 4		2. Page 1 2 of 2		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address RB&W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240						A. State Manifest Document Number							
4. Generator's Phone (216) 673-3446						B. State Generator's ID							
5. Transporter 1 Company Name ALCHEM-TRON INC.						C. State Transporter's ID							
6. US EPA ID Number 0 H D 0 7 7 7 8 6 3 0 9						D. Transporter's Phone							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address ALCHEM-TRON INC. 7415 BESSEMER AVE. CLEVELAND, OHIO 44127						G. State Facility's ID							
10. US EPA ID Number 0 H D 9 8 0 5 6 9 4 3 8						H. Facility's Phone 216-441-5628							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. #5 ULTRA SOLVENT-ORM-A WASTE TRICHLORETHANE - UN 2831						0 0 DM		1 6 5		G		F001	
b. #6 PICKLE FINE BOTTOM OF TANK NON-HAZARDOUS						0 0 DM		2 7 5 110		G		N/A	
c. #7 HYDROCHLORIC ACID - COR WASTE CORROSIVE LIQUID - UN 1760						0 0 1 DM		5 5		G		D002	
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above T50-63 TA TA							
15. Special Handling Instructions and Additional Information													
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Printed/Typed Name NICK P. GEORGE						Signature "On behalf of" Carl P. Wohlwend						Month Day Year 0 4 1 6 8 7	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name E.W. Frack						Signature E.W. Frack						Month Day Year 0 4 1 6 8 7	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name						Signature						Month Day Year	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name P. SINGH						Signature P. Singh For Alchem-Tron						Month Day Year 0 4 1 6 8 7	

REPORTABLE QUANTITY VALUE RQ's - 5000/1000/100/10/1	CHEM TREC = 800-424-9300	PLACARDS PROVIDED
CHARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER	EPA HOTLINE = 800-424-9346	
	CDC POISON CENTER = 404-635-5313	
	DOT = 202-426-1830	
800-424-8802		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OH D00419661400162		Manifest Document No. 1 of 2		2. Page 1 1 of 2		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address RB & W CORPORATION 800 MOGADORE ROAD - KENT, OHIO 44240						A. State Manifest Document Number									
4. Generator's Phone (216) 673-3446						B. State Generator's ID									
5. Transporter 1 Company Name ALCHEM-TRON INC						6. US EPA ID Number OH D981795206									
7. Transporter 2 Company Name						8. US EPA ID Number									
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127						10. US EPA ID Number OH D980569438									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.			
a. PHOSPHATE WASTE A08685 RQ 1 - ORM E - UN 9189						005 DM		275 G				D006			
b. HYDROCHLORIC ACID WASTE A08687 CORROSIVE LIQUID NOS UN 1760						601 DM		55 G				D002			
c. HEAVY OIL SLUDGE - NON-HAZARDOUS SOLID #A09532						006 DM		330				N/A			
d. NON-HAZARDOUS LIQUID CLEANER - SOLVENT #A21801						002 DM		110				N/A			
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above T21-Y5 T21-Y5									
15. Special Handling Instructions and Additional Information															
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Printed/Typed Name NICK P. GEORGE						Signature "on behalf of" Nick P. George						Month Day Year 09/28/87			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name WALLACE E. BOOTH						Signature Wallace E. Booth		Month Day Year 09/28/87	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Month Day Year	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name JOHN BONDER						Signature John Bonder for AL-TRON						Month Day Year 09/28/87			

ANY UNRECOVERED DIS-
POSAL EQUAL TO OR IN EXCESS OF
HAZARDOUS WASTE ASSIGNED
RQ VALUE TO NATIONAL RESPONSE
CENTER

800-424-8802

REPORTABLE QUANTITY VALUE
RQ's - 5000/1000/100/10/1

a. RQ =
b. RQ =
c. RQ =
d. RQ =

CHEM TREC = 800-424-9300
EPA HOTLINE = 800-424-9346
CDC POISON CENTER = 404-635-5313
DOT = 202-426-1830

PROVIDED

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1	Information in the shaded areas is not required by Federal law.	
Generator's Name and Mailing Address RBFW CORPORATION 800 MOGADORE ROAD - KENT, OHIO 44240		OHD00419661400162		2 of 2		
4. Generator's Phone (216) 673-3446		6. US EPA ID Number OHD981795206		A. State Manifest Document Number		
5. Transporter 1 Company Name ALCHEM-TRON, INC.		8. US EPA ID Number		B. State Generator's ID		
7. Transporter 2 Company Name		10. US EPA ID Number		C. State Transporter's ID OHD981795206		
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127		12. Containers		D. Transporter's Phone 216-659-4813		
		13. Total Quantity		E. State Transporter's ID		
		14. Unit Wt/Vol		F. Transporter's Phone		
		15. Waste No.		G. State Facility's ID		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. CADMIUM WASTE FILTERS #A09530 FORM-E HAZARDOUS WASTE SOLID		001 DM		40 LB		D006
b.						
c.						
d.						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above T27-45				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name NICK P. GEORGE		Signature Nick P. George			Month Day Year 09/28/87	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Wallace E. Booth			Month Day Year 09/28/87	
Printed/Typed Name WALLACE E. BOOTH		Signature			Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature			Month Day Year	
Printed/Typed Name		Signature			Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name JOHN BONDEA		Signature John Bondea for Al-Tron			Month Day Year 09/28/87	

REPORT ANY UNRECOVERED DISCHARGE EQUAL TO OR IN EXCESS OF EACH HAZARDOUS WASTE ASSIGNED "RQ" VALUE TO NATIONAL RESPONSE CENTER 800-424-8802	RQ's - 5000/1000/100/10/1	CHEM TREC EPA HOTLINE = 800-424-9346 CDC POISON CENTER = 404-635-5313 DOT = 202-426-1830	PROVIDED
--	---------------------------	---	----------

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OHDO0419661400161		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address R B & W CORPORATION 800 MOGADORE ROAD, KENT, OHIO 44240				A. State Manifest Document Number			
4. Generator's Phone (216) 673-3446				B. State Generator's ID			
5. Transporter 1 Company Name ALCHEM-TRON INC				C. State Transporter's ID OHDO981795206			
6. Transporter 1 US EPA ID Number OHDO77786309				D. Transporter's Phone 216-657-4813			
7. Transporter 2 Company Name				E. State Transporter's ID			
8. Transporter 2 US EPA ID Number				F. Transporter's Phone			
9. Designated Facility Name and Site Address ALCHEM-TRON INC 7415 BESSEMER AVE CLEVELAND, OHIO 44127				G. State Facility's ID			
10. Facility US EPA ID Number OHDO980569438				H. Facility's Phone 216-441-5628			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity	
				No. Type		Unit Wt/Vol	
a. OIL CONTAINING CYNIDE A21799 LIQUID NOS - UN A189 RQ10 POISON "B"				001 DM		55 G F010	
b. CYNIDE POT (CYNIDE POWDER) A21800 - RQ10 - UN 1588 POISON "B" - CYNIDE MIXTURE DRY NOS				001 DM		55 G F011	
c. CADMIUM BATH WASTE A10317 (SLUDGE) UN 1588 - POISON "B" RQ10				001 DM		55 G F008	
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above T27-50-38-63 T27-45 T27-45			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name NICK P. GEORGE				Signature N. P. George		Month Day Year 09/28/87	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name WALLACE E. BOOTH				Signature Wallace E. Booth		Month Day Year 09/28/87	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name JOHN BONDEA				Signature John Bondea for Al-Tron		Month Day Year 09/28/87	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

25 JUN 1987

REPLY TO THE ATTENTION OF:

Honorable J.F. Greene
Office of Administrative Law Judges (A-110)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: RB & W Corporation
Docket No. RCRA-V-W-87-R-040

Dear Judge Greene:

In response to your letter dated June 16, 1987, efforts have been made to settle this matter. A conference call was held on May 8, 1987 between the parties. During this call the violations cited in the complaint were discussed. RB & W expressed a willingness at that time to pay part of the penalty. On May 29, 1987 laboratory analysis reports relating to one of the observations were forwarded to EPA by respondent's counsel in order to further negotiation.

A discussion by telephone was held on June 22, 1987 between counsel for the respondent and myself. This discussion clarified the main area of dispute hindering settlement. It is believed that it may be possible to resolve this dispute, in which case settlement can be reached.

Please be advised that I am replacing Linda Bullen as counsel for EPA assigned to this case.

Respectfully submitted,

Thea Dunmire

Thea Dunmire
Assistant Regional Counsel

cc: Mark I. Wallach, Esq.
Attorney for Respondent

Beverly Shorty
Regional Hearing Clerk

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166

Telex 980499

May 29, 1987

RECEIVED
JUN 1 - 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Linda M. Bullen, Esq.
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Re: RB&W Corporation,
Docket No. V-W-87 R-040

Dear Linda:

Enclosed is a copy of the Answer and Request for Hearing which I am filing in the above-captioned matter. I understand that the filing of this document will not interfere with the pursuit of our settlement negotiations.

To further those negotiations, I am enclosing the Waste Profile Data Form and Lab Report from Alchem Labs regarding the two barrels of material which were described in the letter describing the December 8, 1986 investigation as not having been tightly covered, and which allegedly contained hazardous waste. The Lab Report confirms that the materials contained in those drums were not, in fact, hazardous.

As I told you today on the telephone, regarding the plating tanks which are no longer operating, the Cad plating line was taken out of production on April 30, 1987, at which time samples indicated that the plating solution was still useable. The Phosphating/Coating line has been completely emptied of all liquids, which were disposed of through Enivrite and rendered non-hazardous on March 31, 1987. Tank sludge will be disposed of as part of final closure if no sale is completed.

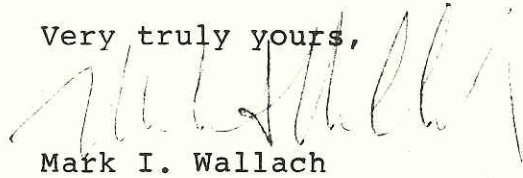
Calfee, Halter & Griswold

Linda M. Bullen, Esq.
May 29, 1987
Page 2

Consequently, RB&W considers the plating solution in the Cad plating line to be process material, and not waste material at the present time.

I look forward to hearing from you further regarding the proposed settlement of this matter.

Very truly yours,



Mark I. Wallach

MIW:fmm

Enclosures

cc: Mr. Paul Dimock (w/enclosures)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)
)
RB&W Corporation)
800 Mogadore Road)
Kent, Ohio 44240)
(EPA ID No. OHD 004 196614)) Docket No. V-W-87 R-040

ANSWER AND REQUEST FOR HEARING

Respondent, RB&W Corporation ("RB&W"), for its Answer to the Complaint, Findings of Violation and Compliance Order filed by United States Environmental Protection Agency, Region V ("U.S. EPA"), says as follows:

I. PRELIMINARY STATEMENT

RB&W disputes the statements and conclusions contained in the three unnumbered introductory paragraphs of U.S. EPA's Complaint, for the reasons stated in the following specific denials.

II. JURISDICTION

RB&W does not dispute U.S. EPA's jurisdiction over this matter. However, RB&W denies that the Complaint and Compliance Order actually seek to enforce federal and state regulations as applicable.

III. FINDINGS OF VIOLATION

1. RB&W denies that the facility which it operates at 800 Mogadore Road, Kent, Ohio 44240 either generates or stores hazardous waste.

2. RB&W states that Section 3010(a) of RCRA speaks for itself, and otherwise denies the allegations contained in paragraph 2 of the Findings of Violation.

3. RB&W states that U.S. EPA's regulations concerning the generation, transportation, treatment, storage or disposal of hazardous wastes speak for themselves.

4. RB&W states that Section 3005(a) of RCRA, and the regulations promulgated by U.S. EPA pursuant thereto speak for themselves.

5. RB&W states that Section 3005(e) of RCRA speaks for itself, and specifically denies that such section is applicable to RB&W.

6. RB&W admits the allegations contained in paragraph 6 of the Findings of Violation.

7. RB&W admits the allegations contained in paragraph 7 of the Findings of Violation.

8. RB&W denies the allegations contained in paragraph 8 of the Findings of Violation, and specifically denies that it either generates or stores hazardous waste in tanks and containers at the present time.

9. RB&W admits that Ohio EPA conducted RCRA inspections of RB&W's facility on the dates indicated, and communicated certain alleged violations to RB&W at various times subsequent to those inspections, but specifically denies that many of the alleged violations actually occurred. In particular, RB&W denies that the violation alleged in subparagraph 1 of paragraph 9 actually occurred, and specifically avers that the material found on top of the five covered drums was not waste material leaking or otherwise escaping from those drums, and further specifically avers that the two drums alleged not to have been tightly covered did not contain hazardous wastes of any kind, as established by laboratory reports. RB&W further specifically denies that any of the alleged violations were or are continuing. Any of the violations alleged which may have occurred were inadvertent and/or due to problems with employee discipline, and occurred despite the good faith efforts of RB&W to comply with RCRA regulations.

10. RB&W admits the allegations contained in paragraph 10 of the Findings of Violation.

11. RB&W admits the allegations contained in paragraph 11 of the Findings of Violation.

IV. COMPLIANCE ORDER

RB&W denies that any Compliance Order is required or appropriate, since RB&W no longer generates or stores any hazardous wastes. To the extent any Compliance Order requiring documentation of that fact is deemed appropriate, the Compliance Order set forth in paragraphs A, B, C, and D of the proposed Compliance Order is unnecessary and overbroad.

V. PROPOSED CIVIL PENALTY

RB&W denies that any of the violations cited were "serious", that there was any potential harm to human health and the environment, that any of the alleged violations were continuing, or that any civil penalties are appropriate. Should any civil penalties be deemed appropriate, RB&W states that the amount proposed to be assessed by U.S. EPA is grossly disproportionate to the violations alleged, and ought to be reduced substantially.

VI. NOTICE OF OPPORTUNITY FOR HEARING

Respondent, RB&W, hereby requests a hearing to contest the allegations disputed in the above specific denials, and, in particular, to dispute the following:

- (1) that any of the violations alleged were serious, or that any of such violations posed

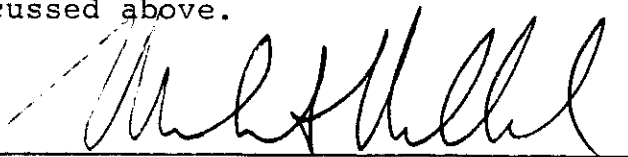
the potential of harm to human health and/or the environment;

- (2) that any of the violations alleged in the Findings of Violation were or are continuing;
- (3) that RB&W ever failed to maintain containers in good condition in violation of Ohio Administrative Code 3745-66-71, 40 C.F.R. 265.171, as alleged in the penalty summary attached as "Attachment 1" to the Complaint. In particular, RB&W denies that any leaking drums were identified by Ohio EPA in any of its inspections of RB&W's facility, and specifically denies that any drums containing hazardous wastes were not tightly covered.

RB&W also seeks to raise, as affirmative defenses, its good faith efforts to achieve and maintain compliance with applicable RCRA regulations, and the fact that RB&W no longer generates or stores hazardous wastes at its Kent facility, and, therefore, ought not to be required to undertake many of the provisions of the proposed Compliance Order.

WHEREFORE, Respondent, RB&W, asks that the Complaint, Findings of Violation and Compliance Order be dismissed or modified in accordance with the above denials and averments, that the proposed Compliance Order be vacated or modified as

set forth above, and that the proposed civil penalty be vacated or reduced as discussed above.



MARK I. WALLACH
CALFEE, HALTER & GRISWOLD
1800 Society Building
Cleveland, OH 44114
(216) 781-2166

Attorney for Respondent RB&W
Corporation

CERTIFICATE OF SERVICE

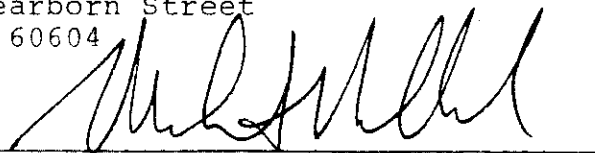
Copies of the foregoing Answer of Respondent RB&W Corporation were served by United States Mail, postage prepaid, on this 28th day of May, 1987 to the following:

Regional Hearing Clerk
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Linda M. Bullen, Esq.
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Mr. Paul Dimock
Waste Management Division
RCRA Enforcement Section
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Regional Administrator
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604



One of the Attorneys for
Respondent RB&W Corporation



ALCHEM LABS

DIVISION OF ALCHEM-TRON, INC.

7415 Bessemer Ave., Cleveland, Ohio 44127 (216) 441-5628

#1

Date Received 1/19/87

R B & W.
800 Mogador Rd.
Kent, Ohio 44240

Attn: Mr. Nick George

Customer I.D. # oil sweepings

P.O. # BN

Date Reported 1/23/87

Alchem-Lab # 870119-2

Description Brown sludge

EP Tox/ Extraction: (SW846)

Arsenic	<.10mg/l
Selenium	<.10mg/l
Lead	<.10mg/l
Cadmium	<.10mg/l
Barium	<.10mg/l
Chromium	<.10mg/l
Silver	<.10mg/l
Mercury	<.01mg/l

As Received:

pH	6 (10% Dispersion)
Color	Black
Texture	solid
Layer	none
Flash Point	>140°F
Specific Gravity at temp.	1.0 at 75°F

K. Chhatriwalla
K. Chhatriwalla
Lab Manager

KAZAR



ALCHEM-TRON, INC. #1

WASTE PROFILE DATA FORM

2 DRUMS
A 08682

A GENERATOR NAME RBW CORP. B GENERATOR EPA ID NO. PHD004196614
C FACILITY ADDRESS 800 MCGADORE ROAD STATE OH ZIP 44240
BILLING ADDRESS 800 MCGADORE ROAD STATE OH ZIP 44240
D BUSINESS CONTACT NICK GEORGE TITLE PLANT ENGINEER PHONE 216-673-3446
E TECHNICAL CONTACT SAME TITLE SAME PHONE SAME

F GENERATOR'S COMMON NAME FOR THE WASTE OIL SWEEPINGS EPA HAZARDOUS WASTE NUMBER(S) NON HAZ.

G DOT SHIPPING DESCRIPTION N/A DOT HAZARDOUS CLASS N/A UN/NA# N/A

H PROCESS GENERATING WASTE

I ANNUAL QUANTITY UNIT OF MEASURE WILL BE SHIPPED PER:
☐ WEEK ☐ MONTH ☐ QUARTER ☐ YEAR ☐ ONE TIME ☐ OTHER, Specify

J CHEMICAL COMPOSITION

CONSTITUENT	ANALYSIS (%)	RANGE (%)
WATER		

K PHYSICAL PROPERTIES

COLOR BLACK BROWN SLUDGE ODOR: ☒ NONE ☐ STRONG ☐ MILD
DESCRIBE:

PHYSICAL STATE AT 70°F:
☒ SOLID ☐ LIQUID ☒ SEMI-SOLID ☐ POWDER

PHASE LAYERING:
☒ NONE ☐ BILAYERED ☐ MULTILAYERED

pH: ☐ 0 ☐ 2-4 ☐ 7.1-9 ☐ >12.5 N/A
☐ <2 ☒ 4.1-7 ☐ 9.1-12.5 6 EXACT

FLASH POINT: ☐ 70°F-100°F ☐ 141°F-200°F
☐ <70°F ☒ 101°F-140°F NO FLASH
☐ EXACT 140°F
☐ CLOSED CUP ☐ OPEN CUP

SPECIFIC GRAVITY: ☐ <0.8 ☐ 0.8-1.0
☒ 1.1-1.2 ☐ 1.3-1.4 ☐ 1.5-1.8 ☐ >1.8
☐ EXACT 1.0 @ 75°F

SOLIDS: BY WEIGHT BY VOLUME
@ pH9 BY WEIGHT BY VOLUME

BTU/GAL BTU/LB

INORGANIC METALS: ☐ Extraction Procedure (mg/l) ☐ Total (ppm)
BARIUM 2.10 mg/L SILVER 2.10 mg/L
CADMIUM 2.10 mg/L ALUMINUM
CHROMIUM 2.10 mg/L BERYLLIUM
CHROMIUM (+6) COPPER
MERCURY 2.10 mg/L NICKEL
LEAD 2.10 mg/L ZINC
SELENIUM 2.10 mg/L

INORGANIC NON-METALS: ☐ Extraction Procedure (mg/l) ☐ Total (ppm)
ARSENIC 2.10 mg/L PHOSPHOROUS
BROMINE SULFUR
CHLORINE SULFIDE
CYANIDE OTHERS

L Does the waste contain any of the following:
Halogenated Aromatics (e.g. PCB, PBB); Aromatic Amines; Pesticides;
Ureas; Thioureas; Cyclic Nitrogen (e.g. Pyridine); Phenols; Quinones;
Phosphorus Compounds; Polycyclic Organics; Asbestos; Radioactive
Material.

☐ YES ☒ NO

If YES Attach Detailed Analysis.

M Special Handling Procedures:

I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete to the best of my knowledge and that all known and suspected hazards have been disclosed in accordance with 40 CFR 261.

N. P. George
SIGNATURE

PLANT ENG
TITLE

3-16-87
DATE

Calfee, Halter & Griswold

Attorneys at Law
1800 Society Building
East Ninth & Superior
Cleveland, Ohio 44114-2688

(216) 781-2166

Telex 980499

May 8, 1987

RECEIVED
MAY 11 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
Hazardous Waste Enforcement Unit

Regional Hearing Clerk
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

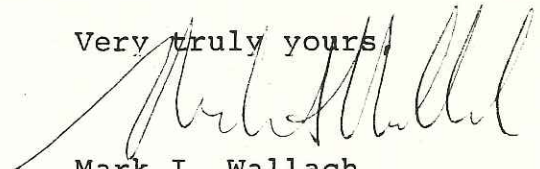
Re: RB&W Corporation,
Docket No.V-W-87 R-040

Gentlemen:

Enclosed for filing please find RB&W's Motion for Extension of Time and proposed Order. Please file stamp the extra copy also enclosed and return it to me in the envelope provided.

Thank you for your attention to this matter.

Very truly yours,


Mark I. Wallach

MIW:fmm
Enclosures

cc: Linda M. Bullen, Esq.)
✓ Mr. Paul Dimock) w/enclosure
Regional Administrator)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)
)
RB&W Corporation)
800 Mogadore Road)
Kent, Ohio 44240)
(EPA ID No. OHD 004 196614)) Docket No. V-W-87 R-040

MOTION FOR EXTENSION OF TIME

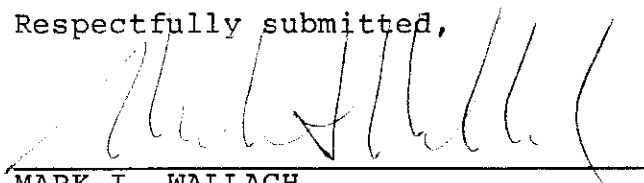
Pursuant to the Agency's Consolidated Rules of Practice governing the administrative assessment of civil penalties and the revocation or suspension of permits, 40 C.F.R. § 22.07(b), Respondent, RB&W Corporation, respectfully requests an extension of time up to and including June 15, 1987, to answer the Complaint, Findings of Violation, and Compliance Order and to request a hearing in the above-captioned matter.

As required by the Agency's Rules and as set forth in the Complaint, RB&W Corporation must request in writing a public hearing on the Order no later than 30 days from the date the Order was served. In addition, RB&W Corporation is required to file a written Answer to the Complaint with the Regional Hearing Clerk, also within 30 days of the receipt of the Notice. As a result of informal settlement conferences with the Agency, commencing on May 8, 1987, it appears that the Agency and RB&W Corporation will probably be able to settle the violations and civil penalties alleged in the Complaint without a hearing or further proceedings.

RB&W Corporation has requested no prior extensions of time in this matter, and believes that this matter ought to be resolved within the period of time herein requested. Negotiations with counsel for the Agency are continuing. Linda M. Bullen, Assistant Regional Counsel, has indicated her consent to the requested extension.

Accordingly, RB&W Corporation respectfully requests that the Presiding Officer grant an extension of time, up to and including June 15, 1987, to answer the Complaint and request a hearing on this matter.

Respectfully submitted,



MARK I. WALLACH
CALFEE, HALTER & GRISWOLD
1800 Society Building
Cleveland, OH 44114
(216) 781-2166

Attorney for Respondent
RB&W Corporation

CERTIFICATE OF SERVICE

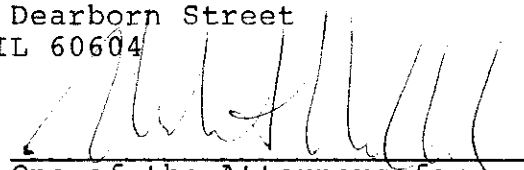
Copies of the foregoing Motion for Extension of Time were sent by United States Mail, postage prepaid, on this 8th day of May, 1987 to the following:

Regional Hearing Clerk
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Linda M. Bullen, Esq.
Assistant Regional Counsel
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Mr. Paul Dimock
Waste Management Division
RCRA Enforcement Section
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604

Regional Administrator
U.S. EPA - Region V
230 South Dearborn Street
Chicago, IL 60604



One of the Attorneys for
Respondent RB&W Corporation

IN THE MATTER OF:)
)
RB&W Corporation)
800 Mogadore Road)
Kent, Ohio 44240)
(EPA ID No. OHD 004 196614)) Docket No. V-W-87 R-040

For good cause shown, Respondent, RB&W Corporation, is granted an extension of time up to and including June 15, 1987 to answer the Complaint and to request a hearing in this matter.

Date: _____, 198__



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

APR 09 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C.T. Corporation System
Registered Agent for
RB & W Corporation
815 Superior Avenue, N.E.
Cleveland, Ohio 44114

Re: Complaint, Findings of Violation
and Compliance Order
RB & W Corporation
EPA I.D. No.: OHD 004 196 614

Dear Sir or Madam:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by RB & W Corporation of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on an inspection of the facility located at 800 Mogadore Road, Kent, Ohio 44240 by the Ohio Environmental Protection Agency, and other information in our files. The Findings in the Complaint state the reasons for such a determination. In essence, the facility failed to meet particular requirements of RCRA relating to storage of waste without a permit or interim status, having open and leaking drums, inadequate aisle space, a deficient personnel training program and contingency plan, and failure to label, date and perform inspections of containers of hazardous waste.

Accompanying the Complaint is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk (5MF-14), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your request should also be sent to Linda M. Bullen, Office of Regional Counsel (5C-16) at the above address.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Paul Dimock, United States Environmental Protection Agency, RCRA Enforcement Section (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604. His phone number is (312) 886-4436.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Mr. Nick P. George
RB & W Corporation
800 Mogadore Road
Kent, Ohio 44240

235.329.230

Edward Kitchen, OEPA

Debbie Berg, OEPA-NEDO

bcc: Robert Small, OWPE (WH-527) ✓

Linda M. Bullen, ORC 5C-16 ✓

Denise Reape ✓

Regional Hearing Clerk, 5MF-14 ✓

OH Permit Unit, 5HS-13 ✓

5HE-12:PDIMOCK:fharris:1/12/87:6-4436

3119

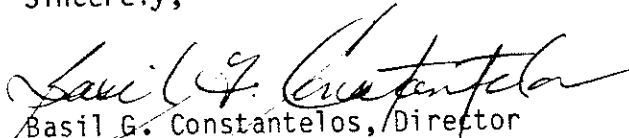
	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SECY	SECT. CHIEF	INFB CHIEF	INFB SEC
MR	JK 3/5/87	P.R. 3/6/87		DB 3-16-87	cap 3-17-87	WEM 3/17/87	OK 3/19/87	

4/1/87
4.1.87

Regardless of whether you choose to request a hearing within the prescribed time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal conference for the purpose of settlement with Waste Management Division staff, please contact Paul Dimock, United States Environmental Protection Agency, RCRA Enforcement Section (5HE-12), 230 South Dearborn Street, Chicago, Illinois 60604. His phone number is (312) 886-4436.

Sincerely,


Basil G. Constantelos, Director
Waste Management Division

Enclosure

cc: Mr. Nick P. George
RB & W Corporation
800 Mogadore Road
Kent, Ohio 44240

Edward Kitchen, OEPA

Debbie Berg, OEPA-NEDO

P 235 329 230

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Name	
Nick P. George	
Street and No.	
800 Mogadore Road	
P.O., State and ZIP Code	
Kent, Ohio 44240	
Postage	\$.73
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.70
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.18
Postmark or Date	
CHICAGO ILL. APR 11 1987	

Paul Dimock SHE-12, RCRA ENF. SECT.

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
• Complete items 1, 2, 3, and 4 on the reverse.
• Attach to front of article if space permits, otherwise affix to back of article.
• Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE \$300

RETURN
TO



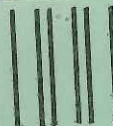
Print Sender's name, address, and ZIP Code in the space below.

Paul Dimock (5HE-12) RCRA ENF.

U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
• Complete items 1, 2, 3, and 4 on the reverse.
• Attach to front of article if space permits, otherwise affix to back of article.
• Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE
USE \$300

RETURN
TO





Print Sender's name, address, and ZIP Code in the space below.

Paul Dimock (5HE-12) RCRA ENF. SECT.

U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

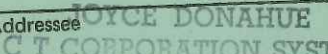
1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to: Mr. Nick P. George RB & W Corporation 800 Mogadore Kent, Ohio 44240	4. Article Number P 235 329 230 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X	8. Addressee's Address (ONLY if requested and fee paid) 626 Franklin 
6. Signature — Agent X 	
7. Date of Delivery 4-15-87	

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to: C.T. Corporation System Registered Agent for RB & W Corporation 815 Superior Avenue, N.E. Cleveland, Ohio 44114	4. Article Number P 235 329 229 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Addressee X 	8. Addressee's Address (ONLY if requested and fee paid) 815 SUPERIOR AVENUE, N. E. CLEVELAND, OHIO 44114
6. Signature — Agent X	
7. Date of Delivery APR 13 1987	

PS Form 3811, Feb. 1986 DOMESTIC RETURN RECEIPT

P 235 329 229

RECEIPT FOR CERTIFIED MAIL

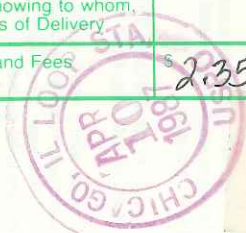
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

★ U.S.G.P.O. 1985-480-794

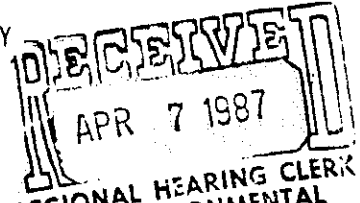
PS Form 3800, June 1985

Sent to	C.T. Corporation System
Street and No.	815 Superior Avenue, N.E.
P.O., State and ZIP Code	Cleveland, Ohio 44114
Postage	\$ 1.90
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.70
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.35
Postmark or Date	

Paul Dimock (5HE-12) RCRA ENF. SECT.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:)

RB & W CORPORATION)
800 MOGADORE ROAD)
KENT, OHIO 44240)

EPA I.D. No: OHD 004 196 614)

DOCKET NO.

COMPLAINT, FINES OF
VIOLATION AND COMPLIANCE ORDER

V-W-- 87 R-040

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is RB & W Corporation, 800 Mogadore Road, Kent, Ohio 44240.

This Complaint is based on information obtained by the U.S. EPA, including compliance inspections conducted by the Ohio Environmental Protection Agency (OEPA), on March 26, 1985, May 15, 1986, and December 8, 1986. At the time of the inspections, violations of applicable State and Federal regulations were identified.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that RB & W Corporation has violated Ohio Administrative Code (OAC) regulations found at OAC 3745-52-11, 12, 21, 3745-65-15, 16, 51 through 55 and 3745-66-94, and 40 CFR 262.11, 262.34(a), 262.34(b), 265.16, 265.35, 265.51 through 55, 265.112, 265.173, 265.174 and 265.194.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928 respectively.

From July 15, 1983, until January 31, 1986, the State of Ohio had Phase I interim authorization pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, to administer a hazardous waste program in lieu of the Federal program. This authorization allowed either the State or U.S. EPA to enforce Ohio hazardous waste statutes and regulations, where applicable, in lieu of Federal statutes. U.S. EPA retained authority in matters related to the issuance of final RCRA Permits during this period. Accordingly, this Complaint and Compliance Order seeks to enforce both Federal and State regulations as applicable.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, RB & W Corporation is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15) and OAC 3745-50-10(A)(2)(62), who owns and operates a facility at 800 Mogadore Road, Kent, Ohio 44240 that generates and stores hazardous waste.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to regulations may be transported, treated, stored or disposed of unless the required notification has been given.

3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. Section 3005(a) of RCRA requires U.S. EPA to publish regulations requiring each person owning or operating a hazardous waste treatment, storage, or disposal facility to obtain a RCRA Permit. Such regulations were published on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require that persons who treat, store, or dispose of hazardous waste submit Part A of the permit application in most instances no later than November 19, 1980.

5. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition on the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA concerning notification of hazardous waste activity have been complied with; and (3) an application for a permit has been made. This statutory authority to operate is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

6. The Respondent, RB & W Corporation, owns and operates a facility at 800 Mogadore Road, Kent, Ohio. The Respondent is a Delaware corporation whose registered agent is C.T. Corporation System, 815 Superior Avenue, N.E., Cleveland, Ohio 44114.

7. On August 4, 1980, a notification of hazardous waste activity for this facility was filed with U.S. EPA pursuant to Section 3010 of RCRA.

8. The Respondent, RB & W Corporation generates and stores hazardous waste in tanks and containers. These wastes have been identified and listed as hazardous wastes under Section 3001 of the Act (U.S. EPA Hazardous Waste Nos. F001, F006, F008, F009, F010, and K062).

9. On March 26, 1986, May 15, 1986, and December 8, 1986, OEPA conducted RCRA inspections of Respondent's facility and observed the following violations on the dates parenthetically noted below:

- a. Failure to make a hazardous waste determination for all wastes generated as required by OAC 3745-52-11 and 40 CFR 262.11 (March 26, 1985, May 15, 1986, and December 8, 1986);
- b. Failure to have accurate manifests as required by OAC 3745-52-21 (March 26, 1985);
- c. Failure to properly label and mark the date of accumulation on tanks and containers as required by 40 CFR 262.34(a) (May 15, 1986, and December 8, 1986);
- d. Storage of hazardous waste for greater than ninety (90) days without meeting the applicable interim status standards for Treatment, Storage, and Disposal facilities identified under 40 CFR 262.34(b) (May 15, 1986, and December 8, 1986);
- e. Failure to remedy documented deterioration of a storage tank as required by OAC 3745-65-15 (March 26, 1985);
- f. Failure to provide and document personnel training and have accurate job descriptions as required by OAC 3745-65-16 and 40 CFR 265.16 (March 26, 1985, May 15, 1986, and December 8, 1986);

- g. Failure to meet the contingency plan requirements contained in OAC 3745-65-51 through 55 and 40 CFR 265.51 through 55 (March 26, 1985, May 15, 1986, and December 8, 1986);
 - h. Failure to maintain adequate aisle space in the drum storage area as required by 40 CFR 265.35 (December 8, 1986);
 - i. Failure to submit a closure plan for a tank and drum storage area as required by 40 CFR 265.112 (December 8, 1986);
 - j. Failure to perform inspections of the container storage area as required by OAC 3745-66-74 and 40 CFR 265.174 (March 26, 1985, and May 15, 1986);
 - k. Failure to inspect the freeboard level of the storage tanks as required by 40 CFR 265.194 (May 15, 1986, and December 8, 1986);
 - l. Failure to properly manage containers as required by 40 CFR 265.173 (December 8, 1986); and
 - m. Shipment of hazardous waste to a nonpermitted facility in violation of OAC 3745-52-12 (May 22, 1985).
10. Respondent was informed of the violations and provided a copy of the March 26, 1985, May 15, 1986, and December 8, 1986, inspection reports in OEPA letters dated April 12, 1985, July 29, 1986, and March 5, 1987, respectively.
11. In a letter dated September 8, 1986, Respondent indicated that all violations identified during the May 15, 1986, inspection had been corrected.

COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

A. Respondent shall immediately upon this Order becoming final cease all treatment, storage or disposal of any hazardous waste except such treatment, storage or disposal as shall be in compliance with the Standards for Hazardous Waste Treatment, Storage, and Disposal facilities, 40 CFR Part 265, and the Standards Applicable to Generators of Hazardous Waste, 40 CFR Part 262, except as provided for in Paragraphs B and C below.

B. Respondent shall within thirty (30) days upon this Order becoming final achieve and document compliance with the following:

1. Submit documentation demonstrating that hazardous waste determinations have been made for all wastes pursuant to 40 CFR 262.11;
2. Label and mark the date of accumulation on all containers of hazardous waste pursuant to 40 CFR 262.34;
3. Provide adequate aisle space in the container storage pursuant to 40 CFR 265.35;
4. Prepare a contingency plan which meets the requirements for such plans contained in 40 CFR 265.52; is maintained in accordance with the requirements of 40 CFR 265.53; and is amended as prescribed by 40 CFR 265.54;
5. Submit documentation that the open and leaking drum problems were immediately corrected pursuant to 40 CFR 265.171 and measures that have been undertaken to minimize future such occurrences; and

6. Submit documentation that tank inspections are being conducted in accordance with the requirements contained in 40 CFR 265.194.

C. Respondent shall within sixty (60) days upon this Order becoming final achieve and document compliance with the following:

1. Provide documentation that all personnel training requirements contained in 40 CFR 265.16 have been completed and documented;
2. Prepare and submit a closure plan for all storage areas where waste has been stored for longer than ninety (90) days. The closure plan shall meet the requirements for such plans contained in 40 CFR 265.112. Upon final approval of the plan, Respondent shall initiate and complete all activities specified in the plan in accordance with the schedule contained therein;
3. Upon completion of closure activities, Respondent shall submit a certification of closure pursuant to 40 CFR 265.115.

D. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted no later than the time stipulated above to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604. Attention: Paul Dimock, RCRA Enforcement Section.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Edward Kitchen, Division of Solid and Hazardous Waste Management, Ohio Environmental Protection Agency, P.O. Box 1049, Columbus, Ohio 43216-1049.

Notwithstanding any other provision of this Order, an enforcement action may be

brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of FIFTY-NINE THOUSAND EIGHT HUNDRED SEVENTY-FIVE DOLLARS (\$59,875) against the Respondent, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 to the Complaint provides a detailed summary of the Proposed Civil Penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division, and the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or

the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator you must file a written answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your answer and any subsequent documents filed in this action should be sent to Linda M. Bullen, Assistant Regional Counsel, at the same address. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

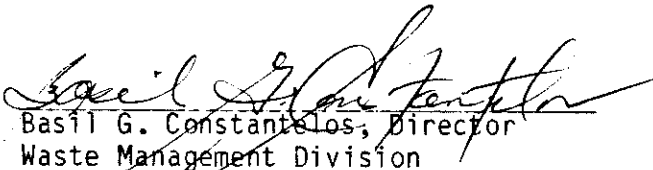
SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business.

Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Paul Dimock, RCRA Enforcement Section (5HE-12), at the address cited above, or by calling him at (312) 886-4436.

Dated this 6th day of April, 1987.


Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in envelopes addressed to:

C.T. Corporation System
Registered Agent for
RB & W Corporation
815 Superior Avenue, N.E.
Cleveland, Ohio 44114

and

Mr. Nick P. George
RB & W Corporation
800 Mogadore Road
Kent, Ohio 44240

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last known addresses to the subscriber.

Dated this 9 day of April, 1987.

John M. Shep, Jr.
Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

ATTACHMENT 1

PENALTY SUMMARY

Regulation Applicable at Time of Violation 40 CFR	Corresponding Regulation Ohio Administrative Code	Nature of Requirement	Penalty Assessed
265.16	3745-65-16	Providing employee training	\$8,125
262.34	3745-52-34	Mark the date of accumulation on containers	\$1,250
265.52 thru 54	3745-65-52 thru 54	Developing an adequate contingency plan and distributing it to emergency response organization	\$8,125
265.171	3745-66-71	Maintain containers in good condition	\$22,500
265.35	3745-65-35	Having adequate aisle space in container storage areas	\$9,500
262.34 (265 and 270)	3745-52-34	Storage over 90 days requires compliance with the Permit requirements and Interim Status requirements	\$2,250
		TOTAL	<hr/> \$59,875

A ENFORCEMENT ACTION SIGN-OFF

P. Dimock/L. Bullen

PART I. BACKGROUND

FACILITY NAME R B & W CORP
 FACILITY LOCATION 800 MOGADORE RD., KENT, OHIO
 RCRA ID NUMBER OHD 004 196 614
 NATURE OF VIOLATION STORAGE OVER 90 DAYS PLUS NUMEROUS
GENERATOR VIOLATIONS

ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER SEVERAL OIL SPILLS TO THE CUYAHOGA RIVER
 AIR NONE KNOWN
 OTHER NONE KNOWN

PART II. RECOMMENDATION ISSUE A 3008 (a) COMPLAINT WITH PENALTY

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
PREPARER	<u>P.S.D.</u>	<u>1/12/87</u>	(✓)	()
CHIEF, RCRA ENF. UNIT	<u>CTL for JB</u>	<u>2/12/87</u>	(✓)	()
CHIEF, RCRA ENF. SECTION	<u>WEM</u>	<u>2-17-87</u>	(✓)	()
ASSISTANT REGIONAL COUNSEL	<u>lmb</u>	<u>2.20.87</u>	(✓)	()

NAME & DATE OF STATE CONTACT NOTIFIED ED KITCHEN 1/12/87
LETTER

PART IV. APPROVAL

1. PREPARER	<u>P.S.D.</u>	<u>3/6/87</u>	(✓)	()
2. CHIEF, RCRA ENF. UNIT	<u>JB</u>	<u>3-12-87</u>	(✓)	()
3. CHIEF, RCRA ENF. SECTION	<u>WEM</u>	<u>3/19/87</u>	(✓)	()
4. CHIEF, H.W. ENF. BRANCH	<u>WEM</u>	<u>3/19/87</u>	(✓)	()
5. ASSISTANT REGIONAL COUNSEL	<u>L. Bullen</u>	<u>4.1.87</u>	(✓)	()
6. CHIEF, S.W. & E.R. SECTION	<u>oms</u>	<u>4/1/87</u>	(✓)	()
7. CHIEF, SOLID WASTE & EMER. RESPONSE BRANCH	<u>WEM</u>	<u>4/1/87</u>	(✓)	()
8. REGIONAL COUNSEL	<u>WEM</u>	<u>4/1/87</u>	(✓)	()
9. DIRECTOR, WASTE MGT. DIV.	<u>WEM</u>	<u>4/1/87</u>	(✓)	()

NOTE: Attach sign-off sheet to yellow copy of the enforcement action.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12JCK

JAN 15 1987

Edward Kitchen, Manager
Surveillance and Enforcement Section
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Kitchen:

This letter serves notice that the United States Environmental Protection Agency (U.S. EPA) has initiated formal enforcement action against RB & W Corporation, Kent, Ohio. As you recall, this is a case where it had been agreed that U.S. EPA would pursue escalated enforcement. We anticipate our Complaint in this matter to be filed within the next thirty (30) days. As usual, both you and the appropriate District will be furnished a copy of the Complaint.

Sincerely yours,

William E. Muno, Chief
RCRA Enforcement Section

bcc: James Brossman
Paul Dimock



State Of Ohio Environmental Protection Agency

Northeast District Office
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171



Richard F. Celeste, Governor

re: R, B. & W
Portage County
OHD 004 196 614
RCRA reinspection

March 5, 1987

Mr. Nick P. George, Facilities Engineer
Russell, Burdsall & Ward Corporation
800 Mogadore Road
Kent, Ohio 44240

Dear Mr. George:

On December 8, 1986, I conducted a reinspection of your facility. The purpose of the inspection was to determine your facility's compliance status with applicable State and Federal rules pertaining to the generation and temporary accumulation on-site (in drums and tanks) of regulated hazardous wastes. A copy of the inspection report is attached for your information. The following violations were noted and discussed with you at that time:

1. Failure to Manage Drums of Hazardous Waste in a Manner to Prevent Waste Leakage

Of the drums of hazardous waste stored in building #12, five (5) were noted to have waste pooled on the tops of the lids, in violation of 40CFR 265.173(b) and OAC 3745-66-73(B).

2. Failure to Manage Drums of Hazardous Waste in a Closed Condition

At the same building #12 storage area, two additional drums of hazardous waste were noted to have their lids in an unsecured condition, in violation of 40CFR 265.173(a) and OAC 3745-66-73(A).

3. Failure of Maintain Adequate Aisle Space

R, B & W had failed to provide for adequate aisle space between and around "rows" of hazardous waste drums in building #12, thereby preventing the unobstructed movement of R, B & W personnel and equipment for inspectional and emergency response purposes. R, B & W's failure to maintain adequate aisle space is a violation of 40CFR 265.35 and OAC 3745-65-35.

4. Failure to Make All Necessary Hazardous Waste Determinations

At the building #12 drum storage area, one (1) 55-gallon drum of unknown waste content (i.e., unmarked, unidentifiable by you) was noted stored with empty oil drums. At the recently closed oil lagoon, I noted backfill material which contained patches of an ash or sludge-like waste, the origin

or nature of which was unknown by you. I also noted that several drums, which had been partially buried in the backfilled oil lagoon, appeared to contain waste material dissimilar to the oily sludge previously contained in the lagoon. The nature or origin of this material was again unknown by you.

R, B & W's failure to have properly identified these potentially hazardous wastes is a violation of 40CFR 262.11 and OAC 3745-52-11. A previous violation of this performance standard was noted during my earlier inspection of May 15, 1986.

5. Failure to Conduct Daily Tank Freeboard Inspections

R,B & W has failed to conduct daily inspections of the freeboard level in waste acid tank #19, in violation of 40CFR 265.194(a)(3) and OAC 3745-66-94(C).

6. Failure to Demonstrate < 90 Day Storage of Waste in the Facility's Hazardous Waste Tank Units

R,B & W maintains four (4) tank units for the temporary storage of waste acids, plating solutions, and rinsewaters, numbered tanks #19, 19A, 20 & 20A. R,B & W has failed to demonstrate, either by recordkeeping or by marking accumulation dates on the tanks, that hazardous waste has not remained in any of the tanks in excess of 90 days, in violation of 40CFR 262.34(b) and OAC 3745-52-34(B). It should be pointed out that, of the two methods to demonstrate compliance, R,B & W previously agreed to perform the second option, pursuant to your letter of September 8, 1986.

7. Failure to Maintain Adequate Personnel Training Records

R,B & W has failed to maintain adequate personnel training records pertaining to the dates and content of recent personnel training sessions, and has failed to develop adequate job descriptions for hourly and management personnel involved in handling hazardous waste at the facility, in violation of 40CFR 265.16 and OAC 3745-65-16. Personnel training recordkeeping violations were also previously noted during my May 15, 1986 inspection.

8. Failure to Develop an Adequate Contingency Plan

The facility's contingency plan map fails to note the location of emergency phones, fire extinguishers, and spill response equipment.

The contingency plan fails to describe the types and capabilities of the facility's fire-fighting equipment and spill response equipment.

Waste acid holding tanks are incorrectly numbered on the facility map.

R,B & W moved it's drum accumulation area from building #7 to building #12, but failed to revise the contingency plan to reflect this change in storage location.

The plan fails to contain specific emergency response procedures for fires or spills at the hazardous waste tank units or drum accumulation areas, i.e.,

what fire equipment or spill equipment is to be used in these situation?, what special precautions should personnel follow depending upon the type of waste involved in the incident?, etc.

The contingency plan does not contain any evacuation procedures. Home addresses of the plant's emergency coordinators are not listed.

R, B & W's failure to revise the plan to show a change in the temporary drum storage location is a violation of 40CFR 265.54 and OAC 3745-65-54. All other deficiencies in the plan which are listed above are violations of 40CFR 265.52 and OAC 3745-65-52.

9. Closure Plan Requirements

R, B & W has failed to submit to Ohio EPA and USEPA for approval a closure plan addressing the final closure of Tank #6, in violation of 40CFR 265.112 and OAC 3745-66-12. This plan was previously requested in my letter of July 29, 1986. This plan should include: (a) the methods R, B & W will use to clean and then to analytically demonstrate that the unit is decontaminated; (b) clean levels to be achieved; (c) the intended use of the tank after closure; (d) a schedule for the completion of closure actions; and (e) provisions for closure certification by the owner/operator and independent P.E.

R, B & W should also prepare and submit for approval a closure plan addressing the final closure and decontamination of the previous drum storage area in building #7, as this area previously held hazardous waste drums which had been stored there in excess of 90 days.

As I indicated to you during the December 8th inspection, this matter has been referred to the RCRA Enforcement Section of USEPA - Region V. You are advised to immediately return to compliance regarding all of the above noted deficiencies. If you have questions, please feel free to call.

Sincerely,



Deborah J. Berg
District Inspector
DSHWM-Nedo

cc: Mike Savage, DSHWM - Enforcement, CO
Paul Dimock, USEPA - Region V enforcement

db:db

5HE-12JCK

JAN 15 1987

Edward Kitchen, Manager
Surveillance and Enforcement Section
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Mr. Kitchen:

This letter serves notice that the United States Environmental Protection Agency (U.S. EPA) has initiated formal enforcement action against RB & W Corporation, Kent, Ohio. As you recall, this is a case where it had been agreed that U.S. EPA would pursue escalated enforcement. We anticipate our Complaint in this matter to be filed within the next thirty (30) days. As usual, both you and the appropriate District will be furnished a copy of the Complaint.

Sincerely yours,

ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno, Chief
RCRA Enforcement Section

bcc: James Brossman
Paul Dimock

5HE-12JCK:PDIMOCK:fharris:6-4436:1/12/87

WEM
1-14-87

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWER CHIEF	WMOO DIR
EST. DATE	<i>WEM</i> 1/12/87	<i>P. J. M.</i> 1/12/87		<i>P. J. M.</i> 1-13-87	<i>WEM</i> 1-14-87	<i>WEM</i> 1-15-87		

IN DATE

DUNS: 00-151-5251
R B & W CORPORATION
(FMLY: RUSSELL BURDSALL &
WARD CORPORATION)
+METAL FORMING DIV

DATE PRINTED
DEC 18 1986
MFG NUTS
SIC NO.
34 52

RATING
BRANCH
EMPLOYS 250

800 MOGADORE RD
KENT OH 44240
TEL: 216 673-3446

BRANCH MANAGER: ERNEST GEAR

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)						
REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
12/86	(001)	2500	-0-			6-12 Mos
	(002)	50	-0-			
11/86	Ppt	1000	-0-	-0-		6-12 Mos
	Ppt-Slow 50	10000	2500	1000	1 10 Prox	1 Mo
	Ppt-Slow 50	500	100	-0-	1 10 Prox	1 Mo
	(008)	1000	250	100		1 Mo
10/86	Disc	250	-0-	-0-	1 10 N30	2-3 Mos
	Ppt	2500	-0-	-0-		2-3 Mos
	Ppt	500	500	-0-	N30	1 Mo
	Ppt	50	-0-	-0-	N30	2-3 Mos
	Ppt-Slow 15	1000	500	500		2-3 Mos
09/86	Ppt	1000	1000	-0-		1 Mo
07/86	Slow 30	50	50	50	N30	
06/86	Ppt	500	500	50		1 Mo
	Ppt	500	500	-0-		1 Mo
	Slow 50	100	-0-	-0-	N30	
	Slow 60-90	50	50	50		
	(018)	1000	1000	50		1 Mo
05/86	Ppt	50	-0-	-0-	N30	6-12 Mos
04/86	Slow 5		-0-	-0-		

SPECIAL
EVENTS

11/13/86 Business has changed its name to the captioned.

This is a branch; headquarters are located at 8100 Tyler Blvd,
Mentor, OH. Headquarters D-U-N-S 00-698-7218. The manager has
authority to make all purchases. Bills are paid generally from
headquarters. This branch manufactures nuts.

12-18(SR5 /42)

012

FULL DISPLAY COMPLETE

DUNS: 00-698-7218
 R & W CORPORATION
 FASTENER HOUSE, THE
 BBSOO FASTENING SERVICE
 CENTER

5970 HEISLEY
 AND BRANCH(ES) OR DIVISION(S)
 MENTOR OH 44060
 TEL: 216 357-1200

DATE PRINTED
 DEC 18 1986

MFG METAL SCREWS,
 NUTS AND METAL
 FASTENERS AND WHOL
 METAL FASTENERS

SIC NOS.
 34 52 50 72

SUMMARY
 RATING 4A2

STARTED 1901
 PAYMENTS SEE BELOW
 SALES F \$154,392,000
 WORTH F \$34,445,000
 EMPLOYS 1,520 (25 HERE)
 HISTORY CLEAR
 FINANCING SECURED
 CONDITION GOOD
 TREND DOWN

CHIEF EXECUTIVE: JOHN J. LOHRMAN, CHB

SPECIAL EVENTS

11/11/86 According to published reports, RB&W Corp said it completed the sale of certain assets of its Kendallville, IN plant to B F Goodrich Co, Akron, OH.

11/10/86 Sales for the nine months ended Sep 27 1986 were \$119,408,000 compared to \$118,134,000 for a similar period a year ago.
 Net income for the period was \$1,528,000 compared to \$8,164,000 for the same period last year.

10/28/86 By charter amendment the corporation has changed its name from Russell Burdsall & Ward Corporation to R B & W Corporation.

PAYMENTS REPORTED	(Amounts may be rounded to nearest figure in prescribed ranges)	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
12/86	Ppt		100	-0-	-0-	N7	6-12 Mos
	(002)		2500	-0-			6-12 Mos
	(003)		250	50			
11/86	Disc		2500	1000	-0-	1/2 10 N30	1 Mo
	Ppt		20000	5000	50		1 Mo
	Ppt		20000	10000	500		1 Mo
	Ppt		10000	5000	-0-	N30	1 Mo
	Ppt		10000	10000	-0-	N30	1 Mo
	Ppt		7500	5000	-0-	N30	1 Mo
	Ppt		2500	-0-	-0-	N30	6-12 Mos
	Ppt		2500	-0-	-0-		1 Mo
	Ppt		1000	-0-	-0-	N30	6-12 Mos
	Ppt		1000	-0-	-0-	N30	
	Ppt		750	250	-0-	N30	1 Mo
	Ppt		500	50	50		1 Mo
	Ppt		500	-0-	-0-		2-3 Mos
	Ppt		500	-0-	-0-		6-12 Mos
	Ppt		250	250	-0-	N30	1 Mo
	Ppt		250	100	-0-	N30	1 Mo

10/86

09/86

Ppt	100	-0-	-0-	N30	4-5 Mos
Ppt	100	-0-	-0-	N30	4-5 Mos
Disc-Slow 30	2500	1000	750	1/2 10 N30	1 Mo
Ppt-Slow 30	5000	1000	-0-	N30	1 Mo
Ppt-Slow 30	1000	1000	250	Spec agreement	1 Mo
Ppt-Slow 30	1000	100	100	Spec agreement	2-3 Mos
Ppt-Slow 30	750	50	50	1 10 Prox	1 Mo
Ppt-Slow 30	500	500	250	1 10 Prox	1 Mo
Ppt-Slow 60	15000	10000	250	1 10 Prox	1 Mo
Ppt-Slow 60	10000	2500	1000	1 10 Prox	1 Mo
Slow 30-60	2500	2500	-0-	1 10 N30	1 Mo
(031)	1000	-0-	-0-		
Disc	250	250	-0-	1 10 N30	1 Mo
Disc	250	-0-	-0-	1 10 N30	2-3 Mos
Disc	100	100	-0-	1 10 N30	1 Mo
Disc	50	50	-0-	1 10 N30	1 Mo
Ppt	200000	100000	-0-		1 Mo
Ppt	7500	-0-	-0-	N30	6-12 Mos
Ppt	7500	-0-	-0-		6-12 Mos
Ppt	7500	2500	-0-		1 Mo
Ppt	5000	-0-	-0-		2-3 Mos
Ppt	2500	2500	100	1 10 N30	1 Mo
Ppt	2500	1000	-0-		1 Mo
Ppt	1000	-0-	-0-	N30	2-3 Mos
Ppt	1000	-0-	-0-	1 10 N30	2-3 Mos
Ppt	750	750	-0-		
Ppt	250	-0-	-0-		4-5 Mos
Ppt	250	250	-0-	N30	1 Mo
Ppt-Slow 15	80000	80000	40000	1 10 N30	1 Mo
Ppt-Slow 15	1000	500	500		2-3 Mos
Ppt-Slow 30	2500	-0-	-0-	N10	2-3 Mos
Ppt-Slow 30	1000	-0-	-0-		2-3 Mos
Ppt-Slow 30	50	50	50	N30	2-3 Mos
Ppt-Slow 60	10000	750	-0-		1 Mo
Ppt-Slow 60	1000	1000	250		1 Mo
Slow 15	2500	2500	-0-		
Slow 20	750	50	50		
Slow 30	7500	5000		N30	
Slow 30	500	500		N30	
Slow 30	250	-0-	-0-	N30	2-3 Mos
Slow 45	2500	-0-	-0-		6-12 Mos
Slow 60	250	250	250	N30	
Slow 60-120	5000	750	750		6-12 Mos
(063)	100000	100000	-0-	N30	1 Mo
(064)	90000	90000	-0-	N30	1 Mo
(065)	90000	90000	-0-		1 Mo
(066)	60000	50000	-0-	N30	1 Mo
(067)	40000	-0-	-0-		6-12 Mos
(068)	30000	30000	-0-	N30	1 Mo
(069)	20000	20000	-0-	N30	1 Mo
(070)	1000	-0-	-0-	N30	
Ppt	2500	2500	50	N30	1 Mo

Ppt	1000		Spec agreement	1 Mo
Ppt	250			
Ppt	250	250	-0-	1 Mo
Ppt	50	50	-0-	1 Mo
Ppt-Slow 30	2500	1000	50 N30	1 Mo
Ppt-Slow 30	100	50	50	
Slow	100	-0-	-0-	1 Mo
Slow 15	500	-0-	-0-	
Slow 30	250	250	100 N15	1 Mo

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

UPDATE

12/03/85

Roy C. Kuhn is no longer executive vice president.

FINANCE

- * A FINANCIAL SPREAD SHEET OF COMPARATIVES, RATIOS, AND INDUSTRY AVERAGES *
- * MAY BE AVAILABLE. ORDER A DUNS FINANCIAL PROFILE VIA YOUR DUNSPRINT *
- * TERMINAL OR LOCAL D&B OFFICE *

10/28/85

	Fiscal Consolidated Dec 31 1983	Fiscal Consolidated Dec 31 1984	Fiscal Consolidated Dec 31 1985
Curr Assets	53,486,000	65,071,000	55,653,000
Curr Liabs	19,204,000	26,668,000	16,812,000
Current Ratio	2.79	2.44	3.31
Working Capital	34,282,000	38,403,000	38,041,000
Other Assets	28,605,000	29,403,000	28,413,000
Long Term Debt	37,623,000	40,482,000	30,698,000
Worth	21,376,000	24,780,000	34,445,000
Sales	137,894,000	163,290,000	154,392,000
Net Income (Loss)	1,765,000	17,643,000	8,711,000

Fiscal Consolidated statement dated DEC 31 1985:

Cash	\$ 4,947,000	Accts Pay	\$ 7,585,000
Accts Rec	19,206,000	Accruals	6,194,000
Inventory	23,383,000	L.T. Liab-(1yr)	3,033,000
Supplies	6,815,000		
Ppd	1,292,000		

Curr Assets	55,653,000	Curr Liabs	16,812,000
Fixed Assets	27,216,000	L.T. Debt	30,698,000
Intangibles	909,000	L.T. Liab-Other	2,111,000
Other Assets	1,197,000	COMMON STOCK	4,572,000
		ADDIT. PD.-IN CAP	10,662,000
		RETAINED EARNINGS	20,616,000
		TRANSLATION	
		ADJUSTMENT	(496,000)

Total Assets	84,975,000	Total	84,975,000
--------------	------------	-------	------------

From JAN 01 1985 to DEC 31 1985 sales \$154,392,000; cost of goods sold \$128,163,000. Gross profit \$26,229,000; operating expenses \$17,325,000. Operating income \$8,903,000; other income \$856,000; other expenses \$4,008,000; net income before taxes \$5,751,000; Federal income tax \$1,481,000; tax carryforward \$1,158,000. Extraordinary gain \$3,283,000. Net income \$8,711,000. Retained earnings at start \$11,905,000. Net income

\$8,711,000; retained earnings at end \$20,616,000.

Prepared from statement(s) by Accountant: Price Waterhouse.

ACCOUNTANTS OPINION: "A review of the accountant's opinion indicates that the audit meets generally accepted accounting principles and contains no qualifications".

--0--

Item worth shown in summary section was computed after deduction of intangibles, totaling \$909,000. Accounts receivable shown net less \$411,000 allowance. Fixed Assets shown net less \$10,867,000 depreciation.

BASIS OF CONSOLIDATION: The financial statements present on a consolidated basis the accounts of Russell Burdson & Ward Corporation and its subsidiary, which is wholly-owned. All significant intercompany transactions have been eliminated.

INVENTORIES: Inventories are valued at the lower of cost or market with cost determined using the last-in, first-out (LIFO) method.

LONG TERM DEBT: At Dec 31 1985 long term debt, including current portion, consisted of: Term loan of \$18,000,000.

Revolving loan of \$9,500,000.

Industrial Development: Revenue Bonds of \$3,025,000.

Equipment notes of \$3,179,000.

Capitalized lease obligations of \$27,000.

The term loan is owing to an insurance company and is to be repaid in equal annual principal payments of \$1,800,000 beginning Feb 15 1986.

The revolving loan provides for borrowings up to \$25,000,000 until Dec 31 1987 when the loan can be converted into a term loan payable in sixteen consecutive quarterly installments.

The term loan and the borrowings under the credit agreement are secured by a major portion of the company's current assets and substantially all of the company's fixed assets, and the agreements contain certain covenants which, among other things, restrict the payment of dividends, limit future borrowings, require maintenance of certain financial ratios, and restrict the amount of lease obligations which may be incurred.

The company was in compliance with these restrictions at Dec 31 1985 and for the year then ended.

The industrial revenue bonds are payable in annual installments through 1992.

In 1983 the company purchased certain equipment on a note basis. The notes are payable in 20 quarterly installments beginning six months after the date the equipment was shipped.

LONG TERM LIABILITIES-OTHER: Other long term liabilities include deferred items such as long term employee benefits.

OTHER INCOME: Other income in 1985 consisted primarily of a gain on the sale of real estate.

OTHER EXPENSES: Other expenses of \$4,008,000 were interest charges.

EXTRAORDINARY GAIN: Three of the company's pension plans, which provided coverage to salaried employees, were terminated in Dec 1984. The company purchased annuities to provide guaranteed full benefits for all covered employees with vested or accrued benefits under the terminated plans.

The 1984 extraordinary gain resulting from the termination of the pension plans was comprised of excess funds of approximately \$10,299,000 to be remitted to the company and the reversal of a related long term pension liability of \$603,000. The 1985 extraordinary gain of \$3,283,000 was the result of additional funds remitted to the company upon final approval of the termination of the plans.

LEASES: The company leases certain manufacturing, warehouse and office facilities and other equipment under leases which are generally renewable. Many of the leases provide that the company will pay the taxes, insurance and maintenance on the leased property. Total rent expense for continuing operations charged to income was \$2,522,000 in 1985, \$2,533,000 in 1984 and \$2,563,000 in 1983.

Minimum lease commitments for operating leases are as follows: 1986 - \$2,322,000; 1987 - \$1,808,000; 1988 - \$1,480,000; 1989 - \$799,000 and 1990 - \$79,000.

No contingent liabilities reported.

1985 OPERATING RESULTS: Sales during 1985 declined 5.8% over 1984 volume. Management attributed the slight decline to deliberate changes in the company's marketing direction.

Gross margins, expressed as a percent of sales, held even for both years at approximately 17%.

Net income declined to \$8.7 million in 1985 compared to \$17.6 million in 1984. However, comparison of net income for both years is distorted by unusual gains on the termination of three pension plans. When these unusual gains are eliminated from both years, income from continuing operations for 1985 was \$5.4 million versus \$6.7 million for the previous year.

All earnings were retained resulting in a good increase in equity. Net worth was also favorably impacted to a modest degree by stock options exercised and funds contributed under an employee stock ownership plan.

Majority of internally generated funds were used to make a substantial reduction in long term debt and net working capital held at fairly even levels during 1985.

1984 OPERATING RESULTS: Revenues in 1984 increased 18% over those of 1983 reflecting the significant recovery in the automotive and truck industries as well as increases in the company's share of those markets.

Gross margins improved to 17% in 1984 compared to 15.1% in 1983 largely as a result of increased productivity.

Selling, general and administrative expenses rose only marginally and the company had other income of approximately \$1.3 million from the sale of two plants which had been closed in 1982.

As a result of these factors pretax profits increased in 1984. Net income also benefited from a loss carryforward of \$1.3 million and an extraordinary gain of \$10.9 million from the termination of certain employee pension plans.

Although net income for the year was \$17.6 million, and no dividends were paid, net worth increased by only \$3.4 million. On Dec 31 1984 the company purchased and retired all of its 200,000 shares of preferred stock for \$20 million. The company financed the purchase of its preferred stock through borrowings and the private sale for \$6 million of 1.2 million shares of its common stock to two institutional investors (life insurance companies).

FINANCIAL CONDITION AT DEC 31 1985: The financial condition of the company improved during 1985. A combination of current liabilities and long term debt amounted to 137% of net worth at Dec 31 1985 compared to 271% at Dec 31 1984.

At Dec 31 1985 total current liabilities were 48.8% of net worth. The aggregate of cash and accounts receivable was 144% of total current liabilities.

Accounts receivable were in fairly good relationship to sales and the average collection period computes to 44.8 days.

The company's net working capital was 144% of inventory. The inventory turnover for 1985 was 5.5 times or approximately once every 65 days.

The major portion of long term debt is represented by a term loan to an insurance company and a revolving credit agreement with a bank. Although these loans are secured by most of the company's assets, progress has been made in reducing the debt. During 1985 long term debt was reduced by approximately 32%.

The overall financial condition is considered good. Through a good turnover of inventory and fairly close collection of receivables, the company is generating sufficient liquidity to meet trade bills as agreed. Management attributes reports of slowness by suppliers to disputes or misunderstandings.

SIX MONTHS UPDATE: Sales and earnings are down through the first six months of the current year. Sales for six months ended Jun 28 1986 were \$80,087,000 compared to \$80,971,000 for a similar period in 1985.

Net income was \$2,165,000 compared to \$7,126,000 in 1985's first six months. 1985 result were favorably impacted by an extraordinary gain on the termination of pension plans and utilization of operating loss carryforward aggregating \$3,263,000.

An interim Jun 28 1986 balance sheet shows cash at \$2,939,000; accounts receivable of \$23,203,000 and inventories of \$26,276,000.

Total current liabilities aggregated \$19,088,000.

PUBLIC FILINGS

UCC FILINGS

12/16/86

Financing Statement #1860148325 filed 10-09-86 with Secretary, State of FL. Debtors: R B & W Corporation, Tampa, FL. Secured Party: National City Bank, Cleveland, OH. Collateral: specified accounts receivable, contract rights, chattel paper general intangibles, negotiable instrument, inventory including proceeds and products.

The public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

BANKING

10/86 According to the annual report, the company has a revolving credit agreement with a group of banks which permit borrowings up to \$25 million. \$9.5 million was owing as of Dec 31 1985. The credit agreement is secured by a major portion of the company's current assets and substantially all of the company's fixed assets.

HISTORY

10/28/86

JOHN J. LOHRMAN, CHS-CEO+
ANDREW A. ARENA, V PRES

ROY C KUHN, EX V PRES
BOYD O. MURDOCK, SEC-TREAS

DONALD R. R. LOCKWOOD, V PRES

DIRECTOR(S): The officers identified by (+) and Frances A. Coy, Herbert J. Deitz, Murray J. Howe, Frederick J. Mancheski, Julien L. Mc Call and Thomas E. Mc Ginty.

Incorporated Delaware Mar 19 1929. Authorized capital consists of 8,000,000 shares common stock, \$1 par value and 200,000 shares preferred stock, \$100 par value.

At Dec 31 1985 there were 4,571,589 shares of common issued. No preferred stock was outstanding. Common shares are traded on the American Exchange.

Paid in capital \$15,234,000 on Dec 31 1985. At Feb 1 1985 there were 1,862 common shareholders of record.

Business started 1901 by other interests. 11% of capital stock is owned by officers/directors. 89% of capital stock is owned by the general public and institutional investors. Started by Sol Mangel during 1901 as NY Shirt Waist House. That firm was incorporated under New Jersey laws as NY Shirt Waist House Inc, in 1915. Mar 2 1929 name legally changed to Mangel's Inc.

On Dec 30 1977 acquired the name and most of the assets of Russell Burdsall & Ward Inc, Mentor, OH for \$54,162,000 cash. Majority of funds were derived from a loan of about \$40,000,000. Those acquired assets were merged and the company changed its name to Russell, Burdsall & Ward Inc. On Mar 1 1978 executive headquarters were moved from 5611 Tonnelles Avenue, North Bergen, NJ to Mentor, OH. On Apr 24 1985 the corporation changed its name to R B & W Corporation.

Acquisition: In Apr of 1981 Russell Burdsall & Ward Corporation acquired most of the Industrial Fastener Division of The Lamson & Sessions Co for \$20 million.

Discontinued Operations: In Jul of 1983 the company sold its retail division, Mangel's Stores.

JOHN J. LOHRMAN, born 1920. BS Creighton University, did graduate studies, Wharton School of Business, University of Pennsylvania. Served four years World War II, U S Army. 1946-57 assistant controller of Philadelphia Transportation Co, and a consultant with McKinsey Company. Joined Industrial Fastener Division of The Lamson & Sessions Co 1957, manager distribution and became assistant to the president. Vice president-administration and director 1961; executive vice president in 1969; president in 1973, CHB in 1976. 1977 CHB and CEO and director. 1981 president, CEO and director. 1984 CHB, CEO and director.

ANDREW A. ARENA, born 1947 married. Joined Russell Burdsall & Ward Corporation in 1969. Elected vice president and general manager of distribution division in 1983.

BOYD O. MURDOCK, born 1940 married. 1971 Case Western Reserve University, BS Accounting, 1974 MBA, Finance. 1970-81 employed The Lamson & Sessions Co, 1970 supervisory positions corporate office and industrial fastener div, 1975 corporate assistant controller. 1981 to present Russell Burdsall & Ward Corporation, corporate treasurer. 1984 also secretary.

ROY C. KUHN born 1936 married. Graduated 1959, Case Institute of Technology BSME. 1959-74 employed Parker Hannifin Corp latterly as general manager O Ring Division. 1974-78 employed as executive vice president ABS Industries. 1978-79 employed Koehring Corp as group vice president. 1979-84 employed as division president of the

National Acme Division of Acme Cleveland Corporation. 1984-present employed Russell Burdsall & Ward Corporation as executive vice president.

DONALD R. R. LOCKWOOD born 1954. 1978-85 employed Jacobson Manufacturing Company, latterly as vice president of sales. 1985-86 employed P & R Fasteners as sales manager. Joined this company in 1986 as vice president, international division.

DIRECTORS: FRANCES A. COY, president Coy and Associates Inc.

HERBERT J. DEITZ, partner Cole & Deitz (law firm).

MURRAY J. HOWE, executive vice president Richardson Greenshields Securities Inc.

FREDERICK J. MANCHESKI, CHB Echlin, Inc.

JULIEN L. MC CALL, CHB National City Corporation.

THOMAS E. MC GINTY, president Belvoir Consultants.

OPERATION

10/28/86

Manufactures (65%) metal screws, nuts and other metal fasteners and wholesales (35%) all types of metal fasteners.

Terms of sale are 1% 10 net 30 days. Sales to manufacturers of automotive equipment and farm equipment dealers, steel fabricators, railroads and government accounts. Territory: United States and Canada.

Nonseasonal.

EMPLOYEES: 1,520. 25 employed here.

FACILITIES: Leases 7,000 sq. ft. in brick building in good condition. Premises neat. This is corporate headquarters in an office complex.

LOCATION: Suburban business section on well traveled street.

BRANCHES: On a consolidated basis manufacturing plants are located in Cleveland and Kent, OH; Chicago and Rock Falls, IL; Kendallville, IN; Coraopolis, PA; Coldwater, MI, and Toronto, Ontario, Canada. Product development facilities are maintained at Mentor, OH. Headquarters for the Boeco Fastening Service Center are maintained at Dallas, TX and there are eighteen distribution centers throughout the south, southwest and western states.

The Fastener House division is headquartered in Cleveland, OH and that division has thirteen distribution centers throughout the midwest.

SUBSIDIARIES: The company has one active subsidiary, Lamson & Sessions of Canada Ltd, Toronto. It is wholly-owned. That corporation manufactures and wholesales products similar to the parent in the Canada market. There are intercompany merchandise transactions on regular terms.

12-18 (9A0 /156)

16726

012 163 NH

FULL DISPLAY COMPLETE



State Of Ohio Environmental Protection Agency

P.O. Box 1049, 361 East Broad St., Columbus, Ohio 43216-1049
(614) 466-8565



Richard F. Celeste, Governor

December 10, 1986

William E. Muno, Chief
RCRA Enforcement Section
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED

DEC 12 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT GROUP

Dear Mr. Muno:

In late 1985, in accordance with Ohio's grant commitment and the National Enforcement Response Policy, the Ohio EPA informally referred the Russell, Burdsall & Ward Corporation (RB&W) located in Kent, Ohio to the U.S. EPA for enforcement action for identified RCRA violations.

- I have no
record of
this referral
WEM

Recent conversations between my staff and yours indicates that action by U.S. EPA has not yet been initiated against the RB&W Corporation for the RCRA violations subject of that referral.

Please find enclosed information on additional outstanding RCRA violations discovered as a result of a May 15, 1986 inspection conducted by the Ohio EPA of the RB&W Corporation facility. A follow-up inspection conducted by Ohio EPA on December 8, 1986 revealed that several of the RCRA violations identified during the May 15, 1986 inspection remain outstanding despite Company assurances that they had been remedied. Additionally, other RCRA violations were discovered as a result of this latest inspection. A report on the December 8, 1986 inspection will follow under separate cover.

I am transmitting this information to your office as an addendum to the 1985 enforcement referral for your consideration and enforcement response.

If there are any questions regarding this matter, please contact Michael Savage of my staff at (614) 462-8949.

Sincerely,

Edward A. Kitchen, Manager
Surveillance & Enforcement Section
DSHWM

cc: Mike Savage
Dave Wertz/Debbie Berg, NEDO

ENFORCEMENT REFERRAL

DIVISION OF SOLID AND HAZARDOUS WASTE MANAGEMENT

To: Enforcement Coordinator

From: (District Name) Deborah J. Berg

Date: December 5, 1986

1. Responsible Party(ies):

(a) Name Russell, Burdsall & Ward Corporation

(b) Address 800 Mogadore Road
Kent, Ohio 44240

County: Portage

(c) Contact Person: Mr. Nick P. George, Facilities Engineer

(d) Telephone No.: (216) 673-3446

2. Parent Company (if applicable):

(a) Name: N. A.

(b) Address: _____

(c) Contact Person: _____

(d) Telephone No.: _____

3. Regulatory Status (check appropriate lines)

<input type="checkbox"/> TSD Facility (Permitted)	<input checked="" type="checkbox"/> Generator
<input checked="" type="checkbox"/> TSD activity (Unpermitted)	<input type="checkbox"/> Small Quantity Generator
<input type="checkbox"/> Transporter	<input type="checkbox"/> Unpermitted/Unlicensed
<input type="checkbox"/> Solid Waste (License and/or PTI)	<input type="checkbox"/> Solid Waste Disposal

4. Violation Description:

(a) Location of Violation: 800 Mogadore Road
Kent, Ohio 44240

- (b) Nature of violation. (Specific description of violation, regulation or statute violated, a statement of how long or how often violation has occurred, and environmental and/or health effects of violation.)

R.B & W has failed to submit to Ohio EPA for approval a closure plan for the closure of a tank previously used by R B & W for storage (> 90 days) of a spent plating waste, in violation of OAC 3745-66-12(C).

R, B & W was advised to submit the closure plan in the OEPA inspection letter of July 29, 1986.

In a written response to the agency, dated September 15, 1986, R, B & W indicated that they had removed the plating waste from the tank and ^{had} triple-rinsed it; however R B & W failed to submit the required closure plan. [The closure plan, upon subsequent approval by OEPA, would provide ^{for} a demonstration that the unit has been decontaminated to agreed-to "clean levels" and would provide for the required certifications (owner/operator, independent P.E.) of the closure.]

Note: Additional RCRA violations were discovered as a result of a follow-up inspection conducted by Ohio EPA on 12-8-86 subsequent to completion of the referral package; a follow-up report will be forthcoming.

- (c) Brief description of complaints from the public against the party(ies), if any.

Two complaints were received regarding oil spills from the facility reaching the Cuyahoga River. OEPA investigated in

- April 1979 & March 1985. RB&W has recently closed some old oil pits (non-hazardous) which were suspected of being the source of
(d) Chronology of events (site inspections, letters, meetings, telephone calls). Describe enforcement action already taken against entity for this violation (including letters, telephone calls, meetings). the previous spills.

• May 15, 1986 facility RCRA inspection

• July 29, 1986 OEPA inspection letter to RB&W

• September 15, 1986 response by RB&W

- (e) Index of documents (copies attached).

I. OEPA - DWQMA spill report of March 29, 1985

II OEPA inspection letter of July 29, 1986

III. RB&W document submittal of September 15, 1986

(f) Index of physical evidence (copies attached).

N.A.

(g) Witness list (name, address and phone number of people with firsthand knowledge related to the violation)

Deborah J. Berg OEPA (216) 425-9171

- (h) Extenuating or mitigating circumstances.

- None -

- (i) Possible measures to remedy the violation (e.g., repairs, new process equipment, new procedures, etc.).

R.B. & W. should prepare an adequate closure plan for the plating waste tank and submit it to the agency for approval.

5. Request for Enforcement Action

- (a) Contacts:

District Contact: Deborah J. Berg 214-425-9171

Central Office Contact: Mike Savage 614-462-8949

Legal Office Contact: _____

Other Government Contact: _____

- (b) District recommendation for enforcement action: Director's Findings & Orders requiring submittal of an adequate closure plan within 15-30 days.

(c) Recommendation with respect to publicity: _____

No recommendation at this time.

Signed: Nikrah J. Berg Date: 12-5-86
a Showronshi (Investigator) 12-8-86
Approved: Danille W. West Date: 12-8-86
(District Unit Supervisor)
Approved: W. Showronshi for S. Bruny Date: 12-8-86
(District Chief)

ENFORCEMENT COMMITTEE

Action Recommended: This Company has previously been referred to
Assigned To : USEPA (fall 1985) for enforcement, no action taken to
Date : 12/12/86 [date by USEPA; send amendment
letter requesting actions on additional
violations.

0755S

1:50 pm. December 8, 1986 reinspection
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # _____

U.S. EPA I.D. # OHD 004 196 614

GENERAL INFORMATION

Facility: RB&W Address: 800 Mogadore Road City: Kent
State: Ohio Zip Code: 44240 County: Portage Telephone: 216-673-3446

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	<u>Nick P. George</u>	<u>Facilities Engineer</u>	_____
2.	_____	_____	_____
3.	_____	_____	_____

INSPECTOR(S)

1.	<u>Deborah J. Berg</u>	<u>District Inspector</u>	<u>216-425-9171</u>
2.	_____	_____	_____
3.	_____	_____	_____

INSTALLATION ACTIVITY

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☒ Generator only (G)
☐ Transporter (T)
☐ TSDF only
☐ G-T
☐ G-TSDF
☐ T-TSDF
☐ G-T-TSDF

☐ General Facility Standards, Preparedness
and Prevention, Contingency and Emergency
Manifests/Records/Reporting, Closure
☐ Containers S01
☐ Tanks S02/T01
☐ Surface Impoundments S04/T02
☐ Incineration/Thermal Treatment

☐ Waste Piles S03
☐ Land Treatment D81
☐ Landfills D80
☐ Chemical/Physical/
Biological T04
☐ Groundwater Monitoring
☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

Yes No N/A Remark #

— ✓ ✓ —

2. If "yes", is it complete and accurate?

— — ✓ —

3. Has the facility submitted a Part B?

— — ✓ —

4. Was advance notice of the inspection given? If so, how far in advance?

✓ — 1/2 day —

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

< 90 day drum accumulation
waste solvents, plating wastes

< 90 day tank units (4)
waste acids, plating solutions, rinsewaters

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (DAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	—	✓	—	—
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	—	✓	—	—
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	—	✓	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				1986 manifests since previous inspection
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓	—	—	—
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	✓	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	—	—	✓	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

- | | Yes | No | N/A | Remark # |
|--|-----|----|-----|---|
| 5. The generator meets the following hazardous waste pre-transport requirements: | | | | |
| a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32] | | | | no drum shipments since previous inspection. |
| b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32]. | | | | no drum shipments since previous inspection |
| c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33]. | ✓ | | | bulk shipment placards provided by Envirite |
| 6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50] | | | ✓ | |
| 7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met: | | | | |
| a) The containers ^{units} are clearly marked with the words "Hazardous Waste". | ✓ | | | |
| b) The date that accumulation began is clearly marked on each container. | ✓ | | | however, <90 day storage in the tanks has not been demonstrated (reference 3734.02-E) |
| 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)] | ✓ | | | |
| 9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)]. | | ✓ | | |

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	—	✓	—	—
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	✓	—	—	—
b) Access to telephone, radio or other device for summoning emergency assistance.	✓	—	—	—
c) Portable fire control equipment, <i>spill control equipment</i>	✓	—	—	—
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	—	✓	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	✓	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(D)(C)(D)(E)] and contains the following components:

a) Actions to be taken by personnel in the event of an emergency incident.

— ✓ — —

b) Arrangements or agreements with local or state emergency authorities.

✓ — — —

c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.

— ✓ — —

d) A list of all emergency equipment including location, physical description and outline of capabilities.

— ✓ — —

e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]

— ✓ — —

2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]

✓

RBW will need to resubmit the plan once it is adequately revised

3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]

— ✓ — —

4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]

✓

5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]

— — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

290 day accumulation

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]		<input checked="" type="checkbox"/>		
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>			
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]		<input checked="" type="checkbox"/>		
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]		<input checked="" type="checkbox"/>		
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input checked="" type="checkbox"/>			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input checked="" type="checkbox"/>			
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>			

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] ~~and are equipped with a waste feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)]~~.
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

Yes No N/A Remark #

<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>✓</u>	<u>—</u>	Tank 19 has not been inspected on a daily basis
<u>✓</u>	<u>—</u>	<u>—</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>✓</u>	<u>—</u>
<u>—</u>	<u>—</u>	<u>✓</u>	<u>—</u>

RCRA INTERIM STATUS INSPECTION FORM

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].

b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]

8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]

Yes No N/A Remark #

Tanks 19, 19A,
20 & 20A
used for storage
of K062 and
occasional H₂O for
Cd rinsewater

— — ✓ —

— — ✓ —

— — ✓ —

— — ✓ —

closure plan required
for Tank #6



State Of Ohio Environmental Protection Agency

theast District Office
2110 E. Aurora Road; Twinsburg, Ohio 44087-1969

(216) 425-9171



Richard F. Celeste, Governor

July 29, 1986

RE: RB&W-KENT
PORTAGE COUNTY
G
OHD 004-196-614

RECEIVED

AUG 4 1986

Mr. Nick P. George, Facilities Engineer
Russell, Burdsall & Ward Corporation
800 Mogadore Road
Kent, Ohio 44240

U.S. EPA, REGION 4
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Dear Mr. George:

Thank you for the courtesies extended by you during my May 15, 1986 inspection at your facility. The purpose of this inspection was to determine your facility's compliance status with applicable State and Federal rules pertaining to the generation and temporary accumulation on-site (in drums and tanks) of regulated hazardous wastes. A copy of the inspection report completed at the conclusion of the inspection is attached for your information. The following violations noted in the report require your prompt attention:

1. Storage of Waste On-Site for Greater Than 90 Days

Of the twenty-four drums of hazardous wastes stored in building #7, four (4) drums were noted as having accumulation start dates in excess of 90 days. Secondly, unusable cadmium plating solution (F007) has been held in a dock tank (believed to be Tank #6) in excess of one year, according to your recollection. Both of these situations constitute unauthorized hazardous waste storage and are as such violations of Ohio Revised Code Section 3734.02(E). RB&W should immediately remove these waste materials from the facility by shipping them off-site to a permitted disposal firm. A closure plan for the dock tank should be prepared and submitted for approval (Reference 40 CFR 265.110/OAC 3745-66-10).

2. Failure to Determine Waste Characterization

Several drums stored in an area south of building #6 were unidentified as to their contents. A small dumpster type box (approx. 1 yd³) located in that same area was noted as containing white sludge-like waste which you believed originated from the pickling line. This waste material had not been evaluated for hazardous properties. RB&W's failure to have performed the required waste determinations is a violation of 40 CFR 262.11 and OAC 3745-52-11.

3. Failure to Mark Accumulation Dates

The two waste acid tanks (#19 and 19-A) were not marked with dates of accumulation, in violation of 40 CFR 262.34 (a)(2) and OAC 3745-52-34(A)(2).

4. Failure to Conduct Weekly Drum Inspections

RB&W has failed to conduct weekly inspections of the accumulated hazardous waste drums, in violation of 40 CFR 265.174 and OAC 3745-66-74. You stated that such inspections had not been conducted since the security guard was dismissed.

5. Failure to Conduct Daily Tank Freeboard Inspections

RB&W has failed to conduct the daily freeboard level inspection of tank #19-A (waste pickling acid tank), in violation of 40 CFR 265.194 and OAC 3745-66-94.

Note: Since the weekly log form already uses a number system to identify product and waste tanks, that same system should be used on the daily log form. The corresponding tank numbers should be painted on the tanks as well.

6. Personnel Training

RB&W's personnel training program was found to be inadequate both in its implementation and in record keeping, in violation of OAC 3745-65-16 and 40 CFR 265.16. Management personnel and McArthur Milbry (2nd shift) had not participated in a hazardous waste training session since 1984. Also, job descriptions for the management and hourly personnel performing hazardous waste management duties were not available.

All necessary training should be conducted. (As a reminder, the hourly personnel were last trained in August 1985; so, their 1986 annual training should be done also.) Job descriptions for all appropriate personnel should be revised and updated as necessary to reflect their hazardous waste management duties, and submitted to this office along with the training documentation.

7. Contingency Plan

RB&W's contingency plan does not comply with the applicable State and Federal Rules, OAC 3745-65-51 thru 56 and 40 CFR 265.51 thru 56.

Specifically, the plan needs to be revised to describe appropriate fire and spill response procedures for all hazardous wastes managed at the facility in drums and tanks. The facility map should be updated to show the locations of all hazardous waste drums and tanks, and of all spill and fire response equipment.

The types and capabilities of all spill and fire response equipment should be described in the plan.

The emergency coordinators' list should be updated.

***Documentation demonstrating compliance with the above noted violations should be submitted to this office within thirty (30) days of receipt of this letter.

Mr. Nick P. George
July 29, 1986
Page 3

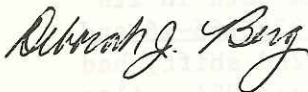
Regarding the weekly drum inspections, please be advised that RB&W is required to conduct and log weekly inspections of all drums of hazardous wastes, including drums in production areas where more than 1 drum (55-gallons) is being accumulated. A copy of the rule describing this 1 drum provision, OAC 3745-52-34, is attached for your information.

Also, during the inspection we viewed RB&W's old wastewater/oily waste lagoon. Per your previous agreement with Mr. William Skowronski of this office, this lagoon was to have been closed in July, 1985. However, I noted that RB&W had not accomplished the task and suggested the name of a clean-up firm who could remove the accumulated oily water from the lagoon to expedite closure. As of this writing, this office expects that RB&W has successfully completed closure of this old lagoon. RB&W should advise this office, in writing, as to its status.

A copy of this inspection report is being forwarded to U.S. EPA - Region V Enforcement Group for their consideration.

If you have questions, please call.

Sincerely,



Deborah J. Berg
District Inspector
Division of Solid and Hazardous Waste
Management

DJB/sp

Enclosure

cc: Dave Mentzer, DSHWM, Central Office
Paul Dimock, U.S. EPA, Region V

May 15 1986 1:00-4:30 p.m.
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

GENERAL INFORMATION

Facility: RB & W. Corporation

Address: 800 Magadore Road

Zip Code: 44240

County: Portage

Telephone: 216-673-3446

State: Ohio

HWFAB # -

U.S. EPA I.D. # OHD 004-196-614

City: Kent

INSPECTION PARTICIPANT(S)

1. (Name) Nick P. George

(Title) Facilities Engineer

(Telephone) 216-673-3446

2. _____

3. _____

INSPECTOR(S)

District Inspector

216-425-9171

1. Deborah J. Berg

2. _____

3. _____

INSTALLATION ACTIVITY

If the site is a TSDF, check the boxes indicating which areas were reviewed.

Mark One

☒ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☐ G-T-TSDF

☐ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure

☒ Containers S01

☒ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?
2. If "yes", is it complete and accurate?
3. Has the facility submitted a Part B?
4. Was advance notice of the inspection given? If so, how far in advance?

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
—	✓	—	—
—	—	✓	—
—	✓	—	—
✓	—	1½ weeks	—

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

~ 90 day storage drums and tanks

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	—	✓	—	—
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	—	✓	—	—
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	—	✓	—	—
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:	<i>based on review of 6 manifests to Enviro in 1986; brought to OEPA on May 16, 1986.</i>			
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].				
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].				
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].				
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].				
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]				

RCRA INTERIM STATUS INSPECTION FORM

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark #</u> |
|--|-------------------------------------|-------------------------------------|-------------------------------------|------------------------------|
| 5. The generator meets the following hazardous waste pre-transport requirements: | | | | |
| a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32] | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>by Hamel</u> |
| b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b). [3745-52-32]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>by RBW</u> |
| c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33]. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>by Enwitt & Hamel</u> |
| 6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50] | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | |
| 7. If the generator elects to store hazardous waste on-site in <u>containers or tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met: | | | | |
| a) The containers are clearly marked with the words "Hazardous Waste". | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b) The date that accumulation began is clearly marked on each container. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <u>tanks</u> |
| 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)] | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| 9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)]. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

NOTE:

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS. GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ✓ — —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. ✓ — — —
 - b) Access to telephone, radio or other device for summoning emergency assistance. ✓ — — —
 - c) Portable fire control equipment. ✓ — — —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. ✓ — — —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] ✓ — — —
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] ✓ — — —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement of emergency or spill control equipment is maintained. (265.35) [3745-65-35] ✓ — — —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] ✓ — — —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Subpart D: Contingency and Emergency

- | | <u>Yes</u> | <u>No</u> | <u>N/A</u> | <u>Remark</u> <u>IL</u> |
|--|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------------|
| 1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(D)(C)(D)(E)] and contains the following components: | | <input checked="" type="checkbox"/> | | |
| a) Actions to be taken by personnel in the event of an emergency incident. | <input checked="" type="checkbox"/> | | | |
| b) Arrangements or agreements with local or state emergency authorities. | | | | |
| c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. | | <input checked="" type="checkbox"/> | | <u>needs revision</u> |
| d) A list of all emergency equipment including location, physical description and outline of capabilities. | | <input checked="" type="checkbox"/> | | |
| e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] | | <input checked="" type="checkbox"/> | | |
| 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] | | <input checked="" type="checkbox"/> | | |
| 3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] | | <input checked="" type="checkbox"/> | | |
| 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] | | <input checked="" type="checkbox"/> | | <u>training not up to date</u> |
| 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] | | | <input checked="" type="checkbox"/> | |

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

1. Hazardous wastes are stored in containers which are:

a) Closed (265.173) [3745-66-73(A)]

b) In good physical condition (265.171) [3745-66-71]

c) Compatible with the wastes stored in them (265.172) [3745-66-72]

2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]

3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]

4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]

5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety), are met (265.176) [3745-66-76]

6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]

Yes No N/A Remark #

☒ ☐ ☐ _____

☒ ☐ ☐ _____

☒ ☐ ☐ _____

☒ ☐ ☐ _____

☒ ☐ ☐ _____

☐ ☒ ☐ _____

☒ ☐ ☐ _____

☒ ☐ ☐ _____

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] ~~and are equipped with a waste feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)]~~.
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

✓	—	—	—
✓	—	—	—
—	✓	—	<i>add Tank 19A to daily log sheet</i>
✓	—	—	—
—	—	✓	—
—	—	✓	—

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].	_____	_____	<u>✓</u>	_____
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	_____	_____	<u>✓</u>	_____
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	_____	_____	<u>✓</u>	_____
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]	_____	_____	<u>✓</u>	_____
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]]	_____	_____	<u>✓</u>	_____

DUNS: 00-151-5261
 RUSSELL BURDSALL & WARD
 CORPORATION

F+METAL FORMING DIV

KENT OH 44240
 800 MOSADORE RD
 KENT OH 44240

TEL: 216 673-3446

DATE PRINTED

OCT 18 1985

RATING

BRANCH

MFG NUTS

EMPLOYS

250

SIC NO.

34 52

BRANCH MANAGER: PAUL D BOY

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
09/85	Ppt	2500	250	-0-		2-3 Mos
	Ppt	750	-0-	-0-	N30	6-12 Mos
	Ppt	100	-0-	-0-		6-12 Mos
	Slow 15	250	-0-	-0-		6-12 Mos
08/85	Disc	1000	250	-0-		1 Mo
	Ppt	50	-0-	-0-	N30	2-3 Mos
	Ppt-Slow 30	15000	15000	10000	1 10 Prox	1 Mo
	Slow 15	250	50	50		
	Slow 30-60	5000	-0-	-0-	1 10 Prox	6-12 Mos
	(O10)	2500	500	250		2-3 Mos
07/85	Ppt	10000	-0-	-0-		4-5 Mos
	Ppt	5000	2500	-0-		1 Mo
	Ppt	1000	750	-0-	N30	1 Mo
	Ppt	100	-0-	-0-	N30	6-12 Mos
	Ppt	50	50	-0-	N30	1 Mo
	Slow 5		-0-			
05/85	Ppt	250	-0-	-0-	N30	6-12 Mos
01/85	Ppt	1000	-0-	-0-	N30	6-12 Mos
	Slow 10	100	-0-	-0-	1/2 10 N30	6-12 Mos
12/84	Slow 90	250	50	-0-		1 Mo
10/84	(O21)	500	-0-	-0-	N30	

This is a branch: headquarters are located at 8100 Tyler Blvd,
 Mentor, OH. Headquarters D-U-N-S 00-698-7218. The manager has
 authority to make all purchases. Bills are paid generally from
 headquarters. This branch manufactures nuts.
 10-18(000 /14)

012

FULL DISPLAY COMPLETE

#IN DATE#

Statement Date: DEC 31 1984
RATING CHANGEDUNS: 00-698-7218
RUSSELL BURDSALL & WARD
CORPORATION5970 HEISLEY
AND BRANCH(ES) OR DIVISION(S)
MENTOR OH 44060
TEL: 216 357-1200DATE PRINTED
OCT 21 1985MFG METAL SCREWS,
NUTS AND METAL
FASTENERS AND WHOL
METAL FASTENERSSIC NOS.
34 52 50 72SUMMARY
RATING 4A3
FORMERLY
--
STARTED 1901
PAYMENTS SEE BELOW
SALES F \$163,290,000
WORTH F \$24,780,000
EMPLOYS 1,700(25 HERE)
HISTORY CLEAR
FINANCING SECURED
CONDITION FAIR
TREND UP

CHIEF EXECUTIVE: JOHN J. LOHRMAN, CHB

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
10/85	Ppt	100000	100000	-0-		1 Mo
	Ppt	70000	40000	-0-	N30	1 Mo
	Disc-Slow 60	20000	10000	250		2-3 Mos
	Disc-Slow 60	2500	750	50		2-3 Mos
	Ppt-Slow 30	750	100	100		4-5 Mos
	(006)	100000	100000	-0-	N30	1 Mo
	(007)	10000	10000	-0-	N30	1 Mo
09/85	Disc	1000	750	-0-	1/2 10 N30	1 Mo
	Disc	250	-0-	-0-	1 10 N30	6-12 Mos
	Ppt	25000	500		N30	
	Ppt	10000	1000	-0-	N30	1 Mo
	Ppt	10000	5000	-0-	N30	1 Mo
	Ppt	7500	-0-	-0-		6-12 Mos
	Ppt	5000	-0-	-0-		6-12 Mos
	Ppt	5000	5000	-0-	N30	1 Mo
	Ppt	5000	2500			
	Ppt	2500	1000	-0-	2 10 N30	1 Mo
	Ppt	2500	250	-0-		2-3 Mos
	Ppt	1000	1000	-0-	N30	1 Mo
	Ppt	500	-0-	-0-		6-12 Mos
	Ppt	250	100	-0-	N30	1 Mo
	Ppt	250	-0-	-0-	N7	4-5 Mos
	Ppt	250	100	-0-	N30	1 Mo
	Ppt	100	-0-	-0-		6-12 Mos
	Ppt	100	100	-0-	N30	1 Mo
	Ppt-Slow 30	10000	7500	5000		1 Mo
	Ppt-Slow 30	10000	2500	-0-		1 Mo
	Slow 5	1000	-0-	-0-		2-3 Mos
08/85	Disc	1000	250	-0-		1 Mo
	Ppt	1000	-0-	-0-	N30	6-12 Mos
	Ppt	1000	-0-	-0-	N30	

07/85

Ppt	750	750	50		1 Mo
Ppt	100	100	-0-	N30	1 Mo
Disc-Slow 30	10000	5000	-0-	1 10 Prox	1 Mo
Ppt-Slow 30	15000	15000	10000	1 10 Prox	1 Mo
Ppt-Slow 30	2500	1000	-0-	N30	1 Mo
Ppt-Slow 30	2500	2500	-0-		2-3 Mos
Ppt-Slow 60	1000	250	50	1 10 Prox	1 Mo
Slow 15	500	500	100		1 Mo
Slow 15	250	-0-	-0-		
Slow 30	250	-0-	-0-	N30	
Slow 100	2500	-0-	-0-		
(043)	500	-0-	-0-		2-3 Mos
Disc	1000	-0-	-0-		2-3 Mos
Disc	250	-0-	-0-	1 10 N30	4-5 Mos
Ppt	10000	5000	-0-		1 Mo
Ppt	10000	5000	-0-		
Ppt	7500	7500	-0-	N30	1 Mo
Ppt	7500	7500	-0-		1 Mo
Ppt	5000	1000	-0-		1 Mo
Ppt	2500	-0-	-0-		
Ppt	2500			N30	1 Mo
Ppt	2500	250	-0-		1 Mo
Ppt	2500	2500	-0-	N30	1 Mo
Ppt	1000	500	-0-	N30	1 Mo
Ppt	1000	750	-0-	N30	1 Mo
Ppt	1000	1000	-0-		
Ppt	1000	-0-	-0-		6-12 Mos
Ppt	750	500	-0-	N30	1 Mo
Ppt	500	-0-	-0-		6-12 Mos
Ppt	500	-0-	-0-	N30	6-12 Mos
Ppt	500	500	-0-	N30	1 Mo
Ppt	500	500	-0-		1 Mo
Ppt	250	-0-	-0-	N30	2-3 Mos
Ppt	250	-0-	-0-		4-5 Mos
Ppt	250	250	-0-	N30	1 Mo
Ppt	250	-0-	-0-		4-5 Mos
Ppt	250	100	-0-	N7	1 Mo
Ppt	250	-0-	-0-	N30	6-12 Mos
Disc-Slow 30	2500	2500	1000		1 Mo
Ppt-Slow 15	250	-0-	-0-	N30	6-12 Mos
Ppt-Slow 30	1000	250	-0-	N30	1 Mo
Ppt-Slow 30	1000	1000	-0-		1 Mo
Ppt-Slow 30	500	100	50	N7	1 Mo
Ppt-Slow 30	250	-0-	-0-		2-3 Mos
Slow 15	1000	250	-0-		
Slow 15	1000	-0-	-0-		
Slow 30	7500	5000		N30	
Slow 30	250	-0-	-0-		6-12 Mos
(080)	15000	-0-	-0-	N30	

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

NANCE

* A FINANCIAL SPREAD SHEET OF COMPARATIVES, RATIOS, AND INDUSTRY AVERAGES
 * MAY BE AVAILABLE. ORDER A DUNS FINANCIAL PROFILE VIA YOUR DUNSPRINT
 * TERMINAL OR LOCAL D&B OFFICE

04/18/85

	Fiscal Consolidated Dec 31 1982	Fiscal Consolidated Dec 31 1983	Fiscal Consolidated Dec 31 1984
Curr Assets	52,625,000	53,486,000	65,071,000
Curr Liabs	12,362,000	19,204,000	26,668,000
Current Ratio	4.26	2.79	2.44
Working Capital	40,263,000	34,282,000	38,403,000
Other Assets	21,668,000	28,605,000	29,403,000
Long Term Debt	36,250,000	37,623,000	40,482,000
Worth	19,565,000	21,376,000	24,780,000
Sales	113,888,000	137,894,000	163,290,000
Net Income (Loss)	(5,413,000)	1,765,000	17,643,000

Fiscal Consolidated statement dated DEC 31 1984:

Cash	\$ 3,909,000	Accts Pay	\$ 9,643,000
Accts Rec	18,964,000	Accruals	5,887,000
Inventory	26,279,000	L.T. Liab-(1yr)	11,138,000
Other Rec	10,299,000		
Supplies	4,710,000		
Ppd	910,000		

Curr Assets	65,071,000	Curr Liabs	26,668,000
Fixt & Equip	27,908,000	Long Term Debt	40,482,000
Intangibles	876,000	L.T. Liab-Other	2,544,000
Ppty Held For		COMMON STOCK	4,425,000
Sale	270,000	ADDIT. PD.-IN CAP	9,683,000
Other Assets	1,225,000	RETAINED EARNINGS	11,905,000
		TRANSLATION	
		ADJUSTMENT	(357,000)

Total Assets	95,350,000	Total	95,350,000
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From JAN 01 1984 to DEC 31 1984 sales \$163,290,000; cost of goods sold \$135,629,000. Gross profit \$27,661,000; operating expenses \$14,837,000. Depreciation \$2,780,000. Operating income \$10,044,000; other income \$1,280,000; other expenses \$4,577,000; net income before taxes \$6,747,000; Federal income tax \$1,257,000; loss carryforward \$1,251,000. Extraordinary gain \$10,902,000. Net income \$17,643,000. Retained earnings at start (\$5,738,000). Net income \$17,643,000; retained earnings at end \$11,905,000.

Prepared from statement(s) by Accountant: Price Waterhouse.
 ACCOUNTANTS OPINION: "A review of the accountant's opinion indicates that the audit meets generally accepted accounting principles and contains no qualifications".

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Item worth shown in summary section was computed after deduction of intangibles, totaling \$876,000. Accounts receivable shown net less \$411,000 allowance. Fixed assets shown net less \$8,410,000 depreciation. The financial statements present, on a consolidated basis, the accounts of Russell, Burdsall & Ward Corporation and subsidiaries, all of which are wholly-owned. All significant

intercompany transactions have been eliminated.

Inventories: Inventories are valued at the lower of cost or market with cost determined using the last-in, first-out (LIFO) method.

Other receivables of \$10,279,000 are funds owing to the company as a result of the termination of certain pension plans.

Three of the company's pension plans, which provided coverage to salaried employees, were terminated in Dec 1984. The company will purchase annuities to provide guaranteed full benefits for all covered employees with vested or accrued benefits under the terminated plans.

The extraordinary gain resulting from the termination of the pension plans is comprised of excess funds, which should approximate \$10,279,000, to be remitted to the company and the reversal of a related long term pension liability of \$603,000.

Property held for sale of \$270,000 consists of fixed assets of certain discontinued operations.

Long term debt, current and deferred, at Dec 31 1984 consisted of:

- Term bank loan of \$18,000,000.

- Revolving bank loan of \$18,500,000.

- Bridge bank loan of \$10,000,000.

- Industrial development revenue bonds of \$860,000.

- Equipment notes of \$4,205,000.

- Capital lease obligations of \$55,000.

On Dec 31 1984 the company entered into a new revolving loan and credit agreement with a group of domestic banks. Under the terms of the new agreement, the company may borrow, on a revolving basis, up to \$25,000,000 until Dec 31 1987, a portion of which can be utilized in the form of an acceptance facility.

The credit agreement also provides that at Dec 31 1987 the company may convert the amount outstanding under the revolving credit facility into a term loan payable in sixteen consecutive quarterly installments of principal and interest commencing Mar 31 1988.

The revolving loan bears interest at a rate of 1/2 of 1 percent above the bank's base rate, and interest is payable quarterly commencing on Mar 31 1985. The term loan bears interest at a rate of 3/4 of 1 percent above the base rate. Compensating balances of 7% of the commitment are required, and the company must pay a commitment fee of 3/8 of 1 percent per year on the average unused portion of the commitment.

The term loan and the borrowings under the credit agreements are secured by a major portion of the company's current assets (other than the receivable which results from the termination of certain defined benefit pension plans that secures the bridge loan referred to below) and substantially all of the company's fixed assets.

The agreements contain certain covenants which, among other things, restrict the payment of dividends, limit future borrowings, require maintenance of certain financial ratios and restrict the amount of lease obligations which may be incurred.

The company was in compliance with these restrictions at Dec 31 1984 and for the year then ended.

On Dec 31 1984 the company also entered into a \$10,000,000 bridge loan agreement and borrowed \$10,000,000 thereunder from the same banks as above. The loan under this agreement is payable in eleven consecutive monthly installments of principal commencing Sep 1 1985 and bears interest until Aug 31 1985 at a rate of 1 percent above the

base rate and thereafter at 1 and 1/4 percent above the base rate.

Interest is payable on Apr 1 1985, Jul 1 1985, Sep 1 1985 and monthly thereafter. The entire bridge loan is classified as current, because it is expected that the company will receive the excess funds from certain terminated pension plans after appropriate approvals by federal agencies in 1985. The excess funds will be used to repay the loan at that time.

The industrial development revenue bonds bear interest of 6.50% and mature through Mar 1992.

The equipment notes were issued in 1983, are secured by equipment, interest at 1/2 of 1 percent above prime and are payable in 20 quarterly installments beginning six months after the date the equipment was shipped.

Long term liabilities other of \$2,544,000 include deferred items such as long term employee benefits.

The company leases certain manufacturing, warehouse and office facilities and other equipment under leases which are generally renewable. Many of the leases provide that the company will pay the taxes, insurance and maintenance on the leased property. Total rent expense for continuing operations charged to income was \$2,633,000 in 1984, \$2,863,000 in 1983 and \$2,755,000 in 1982.

Minimum operating lease commitments for continuing operations are: 1985 - \$2,191,000; 1986 - \$1,403,000; 1987 - \$841,000; 1988 - \$490,000; 1989 - \$182,000 and later years - \$1,000.

No contingent liabilities reported.

This corporation has operated under various forms of ownership since its inception. Since Dec of 1977, when it acquired the assets of Russell Burdsall & Ward for \$54 million (of which \$40 million was borrowed), the business has been in a heavy debt position.

Primarily because of interest expenses the business operated at losses in 1980, 1981 and 1982. In 1982 the loss was widened by a \$5,070,000 charge to income for the eventual discontinuance and sale of the company's unprofitable Mangel's Stores retail division.

During 1983 several programs were essentially completed, which, along with the improving economy, increased sales, reduced costs and returned the company to a profitable basis.

The company sold its plant in Mentor, OH and moved manufacturing to smaller facilities. Also in 1983 total capital expenditures were \$11.1 million with \$5.1 million spent on new machinery to improve the company's capabilities in cold forming parts.

With certain industries showing improvement in 1983 (particularly the automobile field) sales for the company showed an 11% increase over the preceding 12 month period. Also, due to better plant utilization, gross margins improved to 15.1% in 1983 compared to 13% for the preceding year.

The sales improvement and the gain in gross margins were the main reasons for the return to profitability in 1983. Net income was also favorably affected by an operating loss carryforward and a favorable tax settlement on discontinued operations.

Revenues in 1984 increased 18% over those of 1983 reflecting the significant recovery in the automotive and truck industries as well as increases in the company's share of those markets.

Gross margins improved to 17% in 1984 compared to 15.1% in 1983 largely as a result of increased productivity.

Selling, general and administrative expenses rose only marginally and the company had other income of approximately \$1.3 million from the sale of two plants which had been closed in 1982.

Interest expense increased to \$4.6 million due to increased borrowings during the year.

As a result of these factors pretax profits increased in 1984. Net income also benefited from a loss carryforward of \$1.3 million and an extraordinary gain of \$10.9 million from the termination of certain employee pension plans.

Although net income for the year was \$17.6 million, and no dividends were paid, net worth increased by only \$3.4 million. On Dec 31 1984 the company purchased and retired all of its 200,000 shares of preferred stock for \$20 million. The company financed the purchase of its preferred stock through borrowings and the private sale for \$6 million of 1.2 million shares of its common stock to two institutional investors (life insurance companies).

The Dec 31 1984 balance sheet reflected a fair condition with a moderately heavy debt position.

The current position was satisfactory with a combination of cash, accounts receivable and other receivables in excess of total current liabilities.

\$10 million of current liabilities was a bridge bank loan to be paid from the proceeds of other receivables of \$10.3 million.

At Dec 31 1984 cash and accounts receivable were more than double vendor obligations. The average collection period for receivables computed to 42 days.

The company's net working capital was 146% of inventories and the ratio of inventories to sales was 6.2 times.

The combination of good inventory turnover and fairly close collections of receivables has provided sufficient liquidity to meet trade bills as agreed. Management attributes reports of slowness by suppliers to disputes or misunderstandings.

Long term debt at Dec 31 1984 was 163% of tangible net worth. The majority of long term debt is represented by bank borrowings which are secured by a major portion of the company's current and fixed assets.

Although sales were down moderately in the first six months of the current year, profits are up due to higher margins and reductions in expenses.

Sales for the six months ended Jun 29 1985 were \$80,971,000 compared to \$85,307,000 for a similar period in 1984.

Net income was \$7,126,000 compared to \$3,716,000 for 1984's first six months.

An interim Jun 29 1985 balance sheet shows cash at \$3,486,000, accounts receivable of \$22,299,000, receivables resulting from pension plan termination of \$14,462,000 and inventories of \$24,357,000.

Accounts payable and accrued liabilities amounted to \$14,817,000 and current portion of long term debt was \$11,139,000.

There were no major changes in other assets or long term debt.

On Sep 16 1985 Boyd Murdock, secretary and treasurer, said that during Jul and Aug approximately \$13.5 million had been received from the pension plan termination and bank debt had been reduced by that amount.

UCC FILING

04/18/85 Financing Statement #B618807 filed 12-27-84 with Secretary, State of OH. Debtor: Russell Burdsall & Ward Corporation, Mentor, OH. Secured Party: National City Bank, Cleveland, OH. Collateral: specified accounts receivable, contract rights, chattel paper, general intangibles, negotiable instrument, inventory, equipment including proceeds and products.

04/18/85 Financing Statement #B618808 filed 12-27-84 with Secretary, State of OH. Debtor: Russell Burdsall & Ward Corporation, Mentor, OH. Secured Party: National City Bank, Cleveland, OH. Collateral: all equipment and products.

04/18/85 Financing Statement #84312773 filed 12-27-84 with Secretary, State of OH. Debtor: Russell Burdsall & Ward Corporation, El Paso, TX. Secured Party: National City Bank, Cleveland, OH. Collateral: specified general intangibles, accounts receivable, contract rights, chattel paper, negotiable instrument, inventory, equipment including proceeds and products.

BANKING

(9/85) According to the annual report as of Dec 31 1984 the company had borrowed \$18.5 million under a \$25 million revolving credit agreement and \$18 million under a term loan arrangement. Both of these loans are secured by a major portion of the company's current and fixed assets. There was also a \$10 million bridge loan outstanding which the company intends to liquidate in the current year. According to a filing with the SEC all three loans were outstanding in similar amounts as of Jun 29 1985.

HISTORY

04/18/85

JOHN J. LOHRMAN, CHB & CEO+ ROBERT F. DWYER, V PRES
ANDREW A. ARENA, V PRES BOYD D. MURDOCK, SEC & TREAS
DIRECTOR(S): The officers identified by (+) and Frances A. Coy,
Herbert J. Deitz, Murray J. Howe, Frederick J. Mancheski, Julien L.
McCall and Thomas E. McBinty.

Incorporated Delaware Mar 19 1929. Authorized capital consists of 8,000,000 shares common stock, \$1 par value and 200,000 shares preferred stock, \$100 par value.

At Dec 31 1984 there were 4,425,057 shares of common issued. No preferred stock was outstanding. Common shares are traded on the American Exchange.

Paid in capital \$14,108,000 on Dec 31 1984. At Feb 1 1985 there were 2,035 common shareholders of record.

Business started 1901 by other interests. 11% of capital stock is owned by officers/directors. 89% of capital stock is owned by the general public and institutional investors. Started by Sol Mangel during 1901 as NY Shirt Waist House. That firm was incorporated under New Jersey laws as NY Shirt Waist House Inc, in 1916. Mar 2 1929 name legally changed to Mangel's Inc.

On Dec 30 1977 acquired the name and most of the assets of Russell Burdsall & Ward Inc, Mentor, OH for \$54,163,000 cash. Majority of funds were derived from a loan of about \$40,000,000. Those acquired assets were merged. On Mar 1 1978 executive headquarters were moved from 5611 Tonnelle Avenue, North Bergen, NJ to Mentor, OH.

Acquisition: In Apr of 1981 Russell, Burdsall & Ward Corporation acquired most of the Industrial Fastener Division of The Lamson & Sessions Co for \$20 million.

Discontinued Operations: In Jul of 1983 the company sold its retail division, Mangel's Stores.

JOHN J. LOHRMAN, born 1920. BS Creighton University, did graduate studies, Wharton School of Business, University of Pennsylvania. Served four years World War II, U S Army. 1946-57 assistant controller of Philadelphia Transportation Co, and a consultant with McKinsey Company. Joined predecessor company 1957, manager distribution and became assistant to the president. Vice president-administration and director 1961; executive vice president in 1969; president in 1973, CHB in 1976. 1977 CHB and CEO and director. 1981 president, CEO and director. 1984 CHB, CEO and director.

ANDREW A. ARENA, born 1947 married. Joined Russell Burdsall & Ward in 1969. Elected vice president and general manager of distribution division in 1983.

ROBERT F. DWYER, born 1928 married. Associate degree Wright Jr College, Chicago 1954. 1946-47 U S Army. 1961-72 employed MSL Industries Inc as divisional president. 1972-83 employed Romard Northwest Inc as general manager. Joined Russell Burdsall & Ward Corporation in 1984 as vice president.

BOYD D. MURDOCK, born 1940 married. 1971 Case Western Reserve University, BS Accounting, 1974 MBA, Finance. 1970-81 employed The Lamson & Sessions Co, 1970 supervisory positions corporate office and industrial fastener div, 1976 corporate assistant controller. 1981 to present Russell Burdsall & Ward, corporate treasurer. 1984 also secretary.

DIRECTORS: FRANCES A. COY, president Coy and Associates Inc.

HERBERT J. DEITZ, partner Cole & Deitz (law firm).

MURRAY J. HOWE, executive vice president Richardson Greenshields of Canada Ltd.

FREDERICK J. MANCHESKI, CHB Echlin, Inc.

JULIEN L. MC CALL, CHB National City Corporation.

THOMAS E. MC GINTY, president Hunt Valve Company.

OPERATION

04/18/85

Manufactures (65%) metal screws, nuts and other metal fasteners and wholesales (35%) all types of metal fasteners.

Terms of sale are 1% 10 net 30 days. Sells to manufacturers of automotive equipment and farm equipment dealers, steel fabricators, railroads and government accounts. Territory :United States and Canada.

Nonseasonal.

EMPLOYEES: 1,700. 25 employed here.

FACILITIES: Leases 7,000 sq. ft. in brick building in good condition. Premises neat. This is corporate headquarters in an office complex.

LOCATION: Suburban business section on well traveled street.

BRANCHES: On a consolidated basis manufacturing plants are located in Cleveland and Kent, OH; Chicago and Rock Falls, IL; Kendallville, IN; Coraopolis, PA and Toronto, Ontario, Canada. Product development facilities are maintained at Brooklyn Heights, OH. Headquarters for the Bosco Fastening Service Center are maintained at

Dallas, TX and there are nineteen distribution centers throughout the south, southwest and western states.

The Fastener House division is headquartered in Cleveland, OH and that division has thirteen distribution centers throughout the midwest.

SUBSIDIARIES: The company has several inactive subsidiaries.

Its one active subsidiary is Lamson & Sessions of Canada Ltd, Toronto. That corporation manufactures and wholesales products similar to the parent in the Canadian market. There are intercompany merchandise transactions on regular terms.

10-21(972 /108)

15726

012626026 NH

FULL DISPLAY COMPLETE

STEVE



June 24, 1985

William T. Skowronski, P.E.
Unit Supervisor
Division of Solid and Hazardous
Waste Management
Northeast District Office

RECEIVED

JUL 1 - 1985

OHIO EPA-N.E.D.O.

Dear Mr. Skowronski,

This letter is in reply to your correspondence dated June 13, 1985 regarding violations that were noted at the R.B. & W. Kent Plant during the March 26, 1985 inspection by Ohio E.P.A., and Mr. Steve Tuckerman's April 12, 1985 letter listing these violations.

The following information addresses each item individually from both letters.

Item #1 - A telephone conversation with Nick George, R.B. & W. Kent Plant Engineer, on May 23, 1985, indicated to you that we were disposing of unknown wastes through Samsel Services, which is a normal procedure at this facility. After his conversation with you, he investigated and found that no drums were shipped from this plant via Samsel. Nick George then surveyed the facility and took an inventory of the drums and locations.

A collection of 27 drums with known wastes (posted I.D. tags) were determined and the area was posted with proper caution signs. Ms. Gleason of Erieway visited the plant on June 7, 1985, and took samples of all drums for analysis. She informed us that it takes two (2) weeks for this phase. Once the analysis is made, proper disposal will be conducted in 2-5 days.

In addition, Joe Biss, Maintenance Foreman, and our maintenance personnel, went into a different area and found 12-14 drums that contained rain water. This was determined by smell, color and Ph paper. These drums were placed there for future use, but were stored vertically, therefore, water entered. They are now stored in a horizontal position.

With the storage space allotted us by the removal of these 27 drums, we will then collect and store inside any remaining drums containing unknown material and properly dispose after analysis is made. This second phase is expected to begin July 1, 1985, and completed by July 28, 1985.

Item #2 - This is fully explained in Item #1 of this letter.

Item #3 - Names and titles of persons who were informed by Nick George regarding manifest information:

1. Larry Lucks - R.B. & W. Purchasing Agent
2. John Kugler - R.B. & W. Production Manager
3. Joe Biss - R.B. & W. Maintenance Foreman
4. Carl Wohlwend - R.B. & W.-Maintenance
5. Dick Thomas - R.B. & W.-Maintenance

RECEIVED
DEC 23 1985
U.S. EPA, ALBANY
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT SECTION

Item #4 - Container inspections are performed every Wednesday at this plant by a Pinkerton Security employee. This inspection began shortly after the March 26, 1985 E.P.A. inspection. This duty was assigned to one guard, Tom Bosko, Badge #19245. Tom has the daily shift from 3:00 p.m. to 11:00 p.m. Blank sheets were issued with instructions; a copy is enclosed.

Item #5 - Repair of spent Pickle liquor (K062) pit. The request for approval to repair pit was submitted but returned for an attempt to quote a more economical repair cost. We contacted "Envirite" and "Manfredi" regarding the possibility of pumping directly out of the Pickle Tanks and into the tanker. Both sources indicated that there was no problem with this method.

Nick George called Steve Tuckerman on June 19, 1985 and explained this situation to him. He will send instructions regarding the closing of this acid pit.

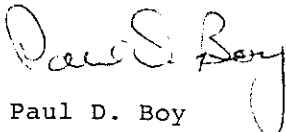
Item #6 - The first shipment copy showing 3,992 gallons was submitted to your office on June 3, 1985. Enclosed is another shipper copy for 5,098 gallons. On June 18, 1985, Manfredi requested to take our spent liquor to be used at Easterly Waste Water Treatment Plant, Cleveland, Ohio. Since this is economically advantageous to us, we will be using this service. The disposal of phosphates will remain the same and will be disposed through Envirite. We will continue to send you copies from both disposal services, as per your request, until further notice.

Item #7 - Surface Impoundment Closure - On June 11, 1985, a letter and photograph of the lagoon (taken on same date) were sent to your office. On June 6-7, 1985, contractor Warner Hughes Inc., began filling the lagoon. He trucked in 343 tons of fill and graded the surrounding area to maintain 3-4 feet of free board. We are also pumping water to reduce liquids. The contractor will return the week of June 24, 1985 with additional fill. We expect the lagoon to be completely filled by end of July, 1985.

Regarding Mr. Tuckerman's letter of April 12, 1985, Items #1, #2, #5, #6, and #7 were covered in this letter. We would need more time to gather and update facts on items #3 and #4. We are requesting an extended time frame to July 12 for completion.

I hope this meets with your satisfaction. Should you have any comments or questions, please do not hesitate to call me at (216) 673-3446.

Sincerely,



Paul D. Boy
General Manager, Nut Division

cc: Mr. Steve Tuckerman, N.E. District Office
Gary Long, R.B. & W. Extrusion & Finishing Mgr.
John Kugler, R.B. & W. Production Control Mgr.
Nick George, R.B. & W. Plant Engineer

cls
attachment

HAZARDOUS WASTE --- DRUM STORAGE

SCHEDULE OF INSPECTION -- WEEKLY

- 1.) Total Drums of Waste? LOCATION
/ NO / YES / DATE / TIME / INSPECTED BY /
- 2.) Are Drums Identified as to Type
of Waste? / / / / /
- 3.) Are Drums Tagged with Proper I.D.
and Dated? / / / / /
- 4.) Floor is Dry--- NO Leaks ? / / / / /
- 5.) Floor Free of Sludge? / / / / /
- 6.) Is "DANGER" Sign Posted & Visible? / / / / /
- 7.) Are There Any Drums Stored For
More than 60 Days? / / / / /
- 8.) Are There Any Drums Stored For
More than 90 Days? / / / / /

NOTE: IF NO IS CHECKED FOR ANY OF THE ABOVE CONDITIONS IMMEDIATELY
NOTIFY THE HAZARDOUS COORDINATOR OR PLANT ENGINEER.

- 1.) Total Drums of Waste? LOCATION
/ NO / YES / DATE / TIME / INSPECTED BY /
- 2.) Are Drums Identified as to Type
of Waste? / / / / /
- 3.) Are Drums Tagged with Proper I.D.
and Dated? / / / / /
- 4.) Floor is Dry--- NO Leaks ? / / / / /
- 5.) Floor Free of Sludge? / / / / /
- 6.) Is "DANGER" Sign Posted & Visible? / / / / /
- 7.) Are There Any Drums Stored For
More than 60 Days? / / / / /
- 8.) Are There Any Drums Stored For
More than 90 Days? / / / / /

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
OH0004196614

Manifest Document No.
099

2. Page 1 of

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

JESSELL, BURDSALL & WARD CORP.
600 MOGADORE ROAD, KENT, OHIO 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name

REFINERS TRANSPORT & TERMINAL

6. US EPA ID Number

OH0000720102

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

ENVIRITE CORP.
2050 CENTRAL AVE., S.E.
CANTON, OHIO 44707

10. US EPA ID Number

OH0980568992

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

(HWM)

a. SPENT SULFURIC ACID PICKLE
LIQUOR K062 (RQ 1000/454)
UN 1832, CORROSIVE MATERIAL (2)

12. Containers

No.

Type

13. Total Quantity

14. Unit

Wt/Vol

1. Waste No.

1

TT

5098

G

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name

L. LUCKS

Signature

L. Lucks

Date

Month

Day

Year

10

17

95

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month

Day

Year

10

17

95

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month

Day

Year

.

.

.

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Date

Month

Day

Year

.

.

.

GENERATOR'S COPY

ENVIRITE CORPORATION
2050 CENTRAL AVE., S.E.
CANTON, OH 44707

BILL OF LADING

11503

ORIGIN RENT, OH load time 7:00 a.m.
DESTINATION Canton, Ohio
CONSIGNOR P.B. & W P.O.# 18653-R
COMMODITY SPENT SULFURIC ACID RQ1000/454 EPA I.D.# DN1832
ENVIRITE I.D.# C0230
CORROSIVE ☐ POISON ☐ ORM-E ☐ p. 72 lbs./gal.

PICKUP DATE 6/12/85
DELIVERY DATE SAME
CONSIGNEE ENVIRITE
QUANTITY
Est. 5018 GAL ☐ LB ☐
GAL ☐ LB ☐
TOTAL

ASK LOADER TO VERIFY PRODUCT SHOWN ABOVE

TRACTOR 337 TRAILER T8410 DRIVER [Signature]
YES NO YES NO YES NO
PUMP ORDERED ☐ ☐ WEIGHT CHARGE ☐ ☐
D TO LOAD ☐ ☐ FT. HOSE ☐ ☐ WEEKEND CHARGE ☐ ☐
MOTOR PUMP ☐ ☐ VAC. ORDERED ☐ ☐ DELAY CHARGE ☐ ☐

DRIVERS MUST USE SPECIFIED SAFETY EQUIPMENT & PROCEDURES

☐ STAINLESS STEEL
MILK TYPE ☒ PLASTISOL PLACARD CORROSIVE
HAT RUBBER GLOVES FACE SHIELD
SUIT GAS MASK SAFETY WATER
EQUIPMENT

IF PRODUCT TEMPERATURE IS OVER 110°F CALL ENVIRITE

	AM	PM
DEPARTED ENVIRITE		
ARRIVED AT CUSTOMER		
STARTED LOADING		
DEPARTED CUSTOMER		
CUSTOMER SIGNATURE	<u>[Signature]</u>	

	AM	PM
ARRIVE ENVIRITE		
TIME SAMPLED		
TIME UNHOOKED		
TIME DEPARTED		
Total Round Trip Time	Hrs	Min

THIS IS TO CERTIFY THAT THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

MILEAGE
END
START 11226
TOTAL

Part 1 - White - Original / Part 2 - Yellow - Numerical / Part 3 - Pink - Transporter / Part 4 - Goldenrod - Customer



Re: RB & W
Portage County
OHD 004-196-614
Generator

RECEIVED
OHIO EPA

JUN 18 1985

DIV. of SOLID & HAZ. WASTE MGT.

RB & W
800 Mogadore Road
Kent, Ohio 44240

June 13, 1985

Attn: Paul Boy, Plant Manager

Dear Mr. Boy:

This letter is a follow-up to a March 26, 1985 hazardous waste inspection conducted at the RB & W facility in Kent by Mr. Steve Tuckerman of my staff. In a letter dated April 12, 1985 (copy enclosed), we requested that within 30 days, written documentation be sent to this office confirming all violations were corrected. Also, during the inspection, Mr. Tuckerman verbally requested your facility expedite the closure of the lagoon at the Kent facility. The company's response dated May 16, 1985 (copy enclosed) lacked sufficient detail and documentation to assure that the violations were corrected; however the letter indicated additional documentation would be forthcoming by May 22, 1985. The documentation was not submitted. On May 23, 1985, I telephoned Mr. George of your staff and requested the following:

1. manifests for drums sent to Samsel Services,
2. analysis of other unknown wastes or a date when the analysis would be completed,
3. names and titles of who was informed regarding manifest information,
4. full discussions of how and where security performs container inspections,
5. a date of commitment for repair of the waste pickle liquor (K062) tank,
6. copies of K062 shipments to Envirite, and
7. how and when the surface impoundment will be closed.

Mr. George stated that he would send these details by May 31, 1985. On June 3, 1985, Mr. George sent us a letter with copies of Envirite manifests. Mr. George stated that the remaining information will be sent June 7, 1985. To this date, we have not received this additional information.

Re: RB & W
Attn: Paul Boy, Plant Manager

June 13, 1985

Page 2

Please advise me when this information will be sent to this office. It is my hope that we can resolve this matter without additional enforcement efforts. Should you have any questions on this matter, please contact me at (216) 425-9171. Thank you.

Sincerely,

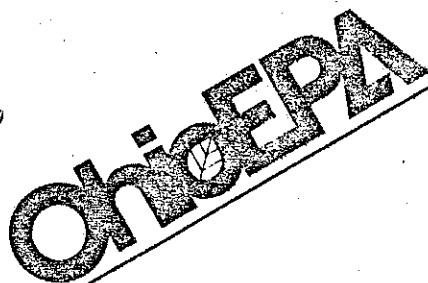


William T. Skowronski, P.E.
Unit Supervisor
Division of Solid and Hazardous Waste Management
Northeast District Office

WTS:kr

Enclosures

cc: N. George, RB & W, Kent
E. Kitchen, DSHWM, Central Office, OEPA
S. Tuckerman, DSHWM, Northeast District Office, OEPA



Re: RB & W
Portage County
OHD 004-196-614
Generator

RECEIVED
OHIO EPA

APR 10 1985

April 12, 1985

RB & W
800 Mogadore Road
Kent, Ohio 44240

DIV. OF SOLID & HAZ. WASTE MGT.

Attn: Nick George

Dear Mr. George:

This letter is a follow-up to my hazardous waste inspection on March 26, 1985 at your facility in Kent. A copy of the inspection report is enclosed for your information. The following violations are noted in the report:

<u>Description of Violation</u>	<u>Regulation</u>
1. "Solid" wastes (several drums and one tank) not evaluated to determine if hazardous.	Ohio Administrative Code (OAC) 3745-52-11
2. Manifests did not contain accurate quantity determination.	OAC 3745-52-21
3. Personnel Training not provided to hourly employees.	OAC 3745-52-34 (OAC 3745-65-16)
4. Contingency Plan not submitted to local emergency service authorities.	OAC 3745-65-53
5. No record of container inspections.	OAC 3745-52-34 (OAC 3745-66-74)
6. Remedy to correct documented deterioration of K062 storage tank not taken.	OAC 3745-66-94 (OAC 3745-65-15)
7. Hazardous waste (spent zinc phosphate solution) disposed at a non-permitted facility.	OAC 3745-52-12 and Ohio Revised Code (ORC) 3734.02

The last violation listed above refers to the spent zinc phosphate solution that was mixed with your spent pickle liquor and disposed/used at the NEORSD Easterly wastewater treatment plant. As I mentioned during the inspection,

Re: RB & W
Mr. Nick George
Page 2

this practice must stop since the exemption cited in OAC 3745-51-06 is applicable to K062 only.

Please submit written documentation within 30 days from receipt of this letter your efforts to correct the above listed violations. This letter and a copy of the inspection report will become part of the official record of the Ohio EPA Division of Solid & Hazardous Waste Management.

Please call if you have questions.

Sincerely,



Steve Tuckerman
Environmental Scientist
Division of Solid & Hazardous Waste Management
Northeast District Office

ST:kr

Enclosure

cc: Kevin O'Grady, DSHWM, Central Office

Inter-office communication

to: Ken Schultz, Chief, Division of Emergency Response date: March 29, 1985
from: Bob Davic, DWQMA, NEDO
subject: Oil spill investigation, R-B-W Corp., Kent, Ohio, Portage County

On March 28, 1985 at approximately 1700 hours I noticed a rainbow colored sheen covering the length of the Cuyahoga River in Kent, about $\frac{1}{2}$ mile upstream of the Middlebury Road bridge. The oil was being discharged into the river from a pipe draining the property of R-B-W Corp (old Lamson and Sessions Co.). The rainbow colored oil was flowing along a ditch located in the northwest section of their property (see attached map). No water samples were collected.

I notified Mr. Ken Parbel, Plant Superintendent, and he immediately had some absorbent booms placed in the ditch to contain the oil. By this time it was dark and had begun to rain. I stayed to talk with Mr. Nick George, Plant Engineer, who arrived from home. According to Mr. George, R-B-W Corp. does not have a water discharge to the ditch. Apparently, the oil substance is leaching from old oil and acid pits that were once used by Lamson and Sessions Co. One of these pits is currently under investigation by Ohio EPA, DSHWM (Steve Tuckerman, NEDO). At this time I had Mr. George report the spill to the ER hotline number in Columbus.

Apparently this is not the first time oil has been observed leaving the property of R-B-W Corp. I have attached a complaint investigation conducted by Bob Mysenski in 1979. From what I could observed, little if anything has been done since this 1979 investigation. The "siphon" dams were not operational and the sides of the ditch were still covered with a dark oily residue. I would expect that this discharge of oil will continue to contaminate the Cuyahoga River unless some corrective measures are taken to contain the oil leaching from the old waste pits. Perhaps this discharge should be placed under a NPDES permit. Let me know if I can be of any further assistance.

cc. Bruce Miller, ER, NEDO
Steve Tuckerman, DSHWM, NEDO
Dennis Lee, IWW, DWPC, NEDO

RB&W

September 8, 1986

Portage County
OHD 004-196-614

Ms Deborah J. Berg, District Inspector
Ohio EPA
Northeast District Office
2110 E. Aurora Rd.
Twinsburg, Ohio 44087-1969

Dear Ms Berg:

The following is the response to your letter dated July 29, 1986.

1. Storage of Waste On-site for Greater Than 90 Days

- A. The four (4) drums which were noted in excess of 90 days have been removed by a licensed waste disposal firm. Enclosed is a copy of the manifest marked "A" Manifest Document No. 62386, Samsel being the transporter, to Erieway for disposal.
- B. The unusable cadmium plating solution (F007) that was being held on our dock - tank #6, has been disposed of through a waste treater. This tank was drained, then rinsed (3) times with fresh water and pumped into same tanker for disposal. Enclosed is a copy of the manifest marked "B" Manifest Document No. 4 00134. Alchem-tron Inc. was the transporter and treater.

2. Failure to Determine Waste Characterization

The drums and dumpster which were located south of building #6 were identified as acidic. Dumpster contents were put in properly lined drums and the drums in question were all properly labeled, identified and dated. A copy of the manifest is enclosed and is marked "A" to indicate disposal date. See Manifest Document No. 62386.

3. Failure to Mark Accumulation Dates

Regarding tanks #19 and #19A, see appendix "B" - 5 (E) Daily Inspection Report. Also, this will be added to training sheet. We will identify and date these tanks per your instructions.

4. Weekly Drum Inspection

Reports will again be conducted by a security person. This person has been promoted to a sergeant of the post and is well qualified to perform this task.

RECEIVED

SEP 15 1986

OHIO EPA-N.E.D.O.

5. Daily Tank Inspection

This has been resumed and your recommendation to identify with the weekly has been done. A copy is submitted for your inspection.

6. Personnel Training Program has been conducted and a copy of the employee's names is enclosed. I am removing Mr. McArthur Milbry from his duties and have replaced him with Mr. Richard Thomas. Mr. Milbry's second shift duties and daylight hours prompted me to make this change. Mr. Thomas has taken the training, past and present. Copies of job descriptions are also submitted for your inspection, designating hazardous management duties for all personnel involved.

7. Also enclosed, you will find a current contingency plan. With this report, a drawing locating all tanks and wastes storage is shown. The smaller drawing shows all exits, hydrants and fire hose locations.

I also wish to inform you that we had spent considerable time and the complete south portion of this plant has been cleaned. Drums are stacked, pallets removed, debris cleaned, bins relocated, all open top tanks and bulk product dumpsters have been turned upside down so no materials can be put in them.

I also wish to inform you that the lagoon is fully covered. We had materials removed (see manifest) then completely covered this area.

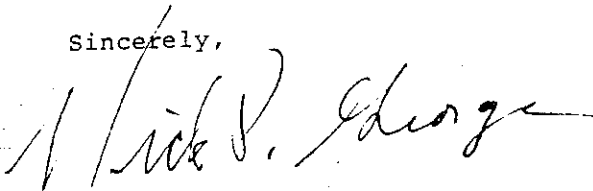
I am also enclosing copies of 1985 manifest that lists drummed wastes that were removed from this facility in the latter part of 1985.

Ms Berg, I sincerely hope that this satisfies your requests of your letter dated July 29, 1986.

A copy of this complete packet will go to the City of Kent.

If there are any further questions or problems, please do not hesitate to call me at 216 673-3446.

Sincerely,



Nick P. George,
Facilities Engineer
RB&W Corporation

NG/rkc

UNIFORM HAZARDOUS WASTE MANIFEST		21. Generator's US EPA ID No. OND004196614		Manifest Document No. 1 62386		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
		3. Generator's Name and Mailing Address 813-W 800 MALADORE RD. KENT, OHIO Generator's Phone (513) 673-3446		5. Transporter 1 Company Name SAMSEL SERVICES CO.		6. US EPA ID Number OND01783143P		C. State Transporter's ID		
4. Generator's Phone (513) 673-3446		7. Transporter 2 Company Name SAMSEL SERVICES CO.		8. US EPA ID Number OND01783148P		D. Transporter's Phone		E. State Transporter's ID		
9. Designated Facility Name and Site Address Erieweg Inc. 33 Industry Drive Bedford OH 44146		10. US EPA ID Number OND055522429		F. Transporter's Phone		G. State Facility's ID		H. Facility's Phone		
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)				12. Containers		13. Total Quantity		14. Unit Wt/Vol		
				No. Type						
GENERATOR	a.	WASTE ACID SLUDGE UN1906 CORROSIVE MATERIAL EPCO 0713		8	DM	3000	P	F006	✓	
	b.	WASTE ACID SLUDGE UN1906 CORROSIVE MATERIAL EPCO 1239		3	DM	800	P	K062	✓	
	c.	HAZARDOUS WASTE LIQUID NOS ORM-E NA9189 EPCO 4307		4	DM	220	G	K062		
	d.	HAZARDOUS WASTE SOLID NOS NA9189 ORM-E EPCO 2293		2	DM	800	P	F006		
J. Additional Descriptions for Materials Listed Above ITEM C. = 2400 P				K. Handling Codes for Wastes Listed Above						
15. Special Handling Instructions and Additional Information W.U. # 33669 C.C. # 1087 P.C. # 1 # 97 JOB # 864030										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.										
Printed/Typed Name NICK P. GEORGE				Signature <i>Nick P. George</i>				Month Day Year 6 23 86		
TRANSPORTER	17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Brian McDaniel</i>				Month Day Year 6 23 86	
	Printed/Typed Name BRIAN MCDANIEL				Signature <i>Joe Monkowski</i>				Month Day Year 7 7 86	
FACILITY	18. Transporter 2 Acknowledgement of Receipt of Materials				Signature <i>Joe Monkowski</i>				Month Day Year 7 7 86	
	Printed/Typed Name JOE MONKOWSKI				Signature <i>Elaine Eden</i>				Month Day Year 6 7 07 86	
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Printed/Typed Name ELAINE EDEN				Signature <i>Elaine Eden</i>				Month Day Year 6 7 07 86		

"B"

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

OH D 0 0 4 1 9 6 6 1

Manifest
Docu

4 00184

2. Page 1
of 1

Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

B & W CORP.

U J Mogadore RD., Kent, OH 44240

4. Generator's Phone (216) 673-3446

5. Transporter 1 Company Name

Alchem-Tron, Inc.

7. Transporter 2 Company Name

6. US EPA ID Number

OH D 0 0 7 7 8 6 3 0 9

8. US EPA ID Number

9. Designated Facility Name and Site Address

Alchem-Tron, Inc.

7415 Bessmer Ave.

Cleveland, Ohio 44127

10. US EPA ID Number

OH D 9 8 0 5 6 9 4 3 8

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

a. Waste Cadmium Plating Solution
Poison B UN 1935

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

1

TT

872

G

F007
D006
D003

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

Nick P. George

Signature

Nick P. George

Month Day Year

7 10 86

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Neil T. Yamitelli

Signature

Neil T. Yamitelli

Month Day Year

7 10 86

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

.

9. Discrepancy Indication Space

RECEIVED

0. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 8. 15 1986

Printed/Typed Name

Signature

OHIO EPA-N.E.D.O

Month Day Year

.

GENERATOR'S COPY

WASTE MANIFEST		1. Generator's US EPA ID No. 10682		2. Page 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RSW INC. 800 MOGADORE RD. KENT OH 44240				4. Manifest Document Number 3410			
4. Generator's Phone (216) 673-3446				5. State Generator's ID NONE			
5. Transporter 1 Company Name RESEARCH OIL COMPANY		6. US EPA ID Number OH0004178612		C. State Transporter's ID		D. Transporter's Phone (216)621-8656	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone	
9. Designated Facility Name and Site Address RESEARCH OIL CO. 2555 TRANSPORT RD. CLEVELAND OH 44115				10. US EPA ID Number OH0004178612		G. State Facility's ID	
				H. Facility's Phone (216)621-8656			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers No. Type		13. Total Quantity	
a. WASTE OIL & WATER NON-HAZARDOUS - FOR RECORD KEEPING PURPOSES ONLY *HAZARD CLASS*: NONE *ID NO.*: NONE				1 11		5000 G	
b.							
c.							
d.							
J. Additional Descriptions for Materials Listed Above *****DESCRIPTIONS AND QUANTITIES SUBJECT TO LABORATORY ANALYSIS*****				K. Handling Codes for Wastes Listed Above S*****			
15. Special Handling Instructions and Additional Information SEE NICK GEORGE TRACTOR #: TRAILER #: THIS DOCUMENT TAKES THE PLACE OF OUR OLD C SLIPS. PLEASE RETAIN FOR YOUR RECORDS. ALL SPILLS MUST BE REPORTED TO THE NATIONAL RESPONSE CENTER AT (800) 424-8802, 24 HOURS PER DAY.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulations from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.							
Printed/Typed Name CARL P. Wolkstein				Signature <i>[Signature]</i>		Month Day Year 08 06 85	
17. Transporter 1 Acknowledgement or Receipt of Materials				Signature <i>[Signature]</i>		Date 08 05 85	
Printed/Typed Name PETER VIDOVIC				Signature <i>[Signature]</i>		Month Day Year 08 05 85	
18. Transporter 2 Acknowledgement or Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space ** ESTIMATED QUANTITY : ** CALCULATED QUANTITY : <div style="text-align: right;">RECEIVED SEP 15 1986</div>							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 <div style="text-align: right;">OHIO EPA-N.E.D.O.</div>							
Printed/Typed Name				Signature		Date Month Day Year	

3-20-85 08:30 -

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

HWFAB #

GENERAL INFORMATION

Facility: RB&W

Address: 800 Mogadore Road

U.S. EPA I.D. # OHD004196614

City: Kent

State: Ohio

Zip Code: 44240

County: Portage

Telephone: (216) 673-3446

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Nick George	Plant Engineer	(216) 673-3446
2.			
3.			

INSPECTOR(S)

1.	Steve Tuckerman	Ohio EPA Environmental Scientist	(216) 425-9171
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☒ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☐ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☐ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- ☐ Containers S01
- ☐ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment

- ☐ Waste Piles S03
- ☐ Land Treatment D01
- ☐ Landfills D00
- ☐ Chemical/Physical/Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

1. Has the facility submitted a Part A to Ohio?

2. If "yes", is it complete and accurate?

3. Has the facility submitted a Part B?

4. Was advance notice of the inspection given? If so, how far in advance?

Yes	No	N/A	Remark #
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4 weeks

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

RBTW manufactures fasteners for general industry (esp. automotive)
 HW activity includes generation & temporary storage of K062, spent
 cadmium plating & phosphating wastes & several de-greasing
 station wastes

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.0
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2.1
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	2.3
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b) The date that accumulation began is clearly marked on each container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>2.2</u>
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>2.4</u>

RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- 2.0 Several "stray" drums contained unknown wastes. One old plating tank contained an unknown solution.
- 2.1 KO₂ is transported to NIOSRD Easterly Plant for use in phosphorus removal.
- 2.2 Hourly employees required to work in the hazardous waste program need personnel training.
- 2.3 Estimates of quantity of wastes were in gross error of actual weights.
- 2.4 For those employees trained

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident. ✓ — — —
 - b) Arrangements or agreements with local or state emergency authorities. — ✓ — —
 - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. ✓ — — —
 - d) A list of all emergency equipment including location, physical description and outline of capabilities. ✓ — — —
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] — — ✓ —
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] — ✓ — —
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54] — — ✓ —
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] ✓ — — —
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)] — — ✓ —

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart C: Preparedness and Prevention

1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] — ☒ — —
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]
 - a) Internal alarm system. — ☒ — —
 - b) Access to telephone, radio or other device for summoning emergency assistance. — ☒ — —
 - c) Portable fire control equipment. — — ☒ —
 - d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. — — ☒ —
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] — ☒ — — 4.0
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34] — ☒ — —
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] — ☒ — —
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)] — ☒ — —
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)] — — ☒ —

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) In good physical condition (265.171) [3745-66-71]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

Subpart J: Storage in Tanks

1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]
 - a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
 - b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

_____	_____	<input checked="" type="checkbox"/>	_____
<input checked="" type="checkbox"/>	_____	_____	_____
<input checked="" type="checkbox"/>	_____	_____	_____
<input checked="" type="checkbox"/>	_____	_____	_____
_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	<input checked="" type="checkbox"/>	_____

RCRA INTERIM STATUS INSPECTION FORM

6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]

a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].

b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.

7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]

8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]

9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97]]

Yes No N/A Remark #

_____ ☒ _____ _____

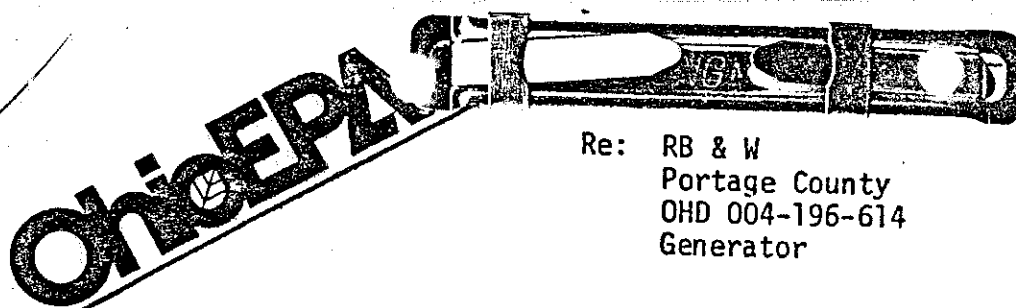
☒ _____ _____ _____

_____ _____ ☒ _____

_____ _____ ☒ _____

_____ _____ ☒ _____

4.0 Communications system is the telephone



Re: RB & W
Portage County
OHD 004-196-614
Generator

file

RB & W
P.O. Box 89
Kent, Ohio 44240

February 22, 1984

Attn: Nick P. George

Dear Mr. George:

Thank you for your letter of February 13, 1984. This documentation indicates that the violations noted during my November 22, 1983 inspection have been addressed. Your facility is now considered to be in substantial compliance with Ohio's Hazardous Waste regulations.

Sincerely,

Steve Tuckerman
Environmental Scientist
Division of Hazardous Materials Management

ST:km

cc: Paula Cotter, Division of Hazardous Materials Management

02-43-0103

Ohio EPA

Re: RB & W
Portage County
OHD004196614
Generator

RECEIVED
OHIO EPA
NOV 30 1983
DIV. HAZARDOUS
MATERIALS MANAGEMENT

RB & W
800 Mogadore Road
Kent, Ohio 44240

November 28, 1983

Attn: Nick George

Dear Mr. George:

Thank you for the courtesies you extended during my hazardous waste generator inspection on November 22, 1983, at your facility in Kent, Ohio. A copy of the inspection report is enclosed for your information. The following violations were noted in the report.

<u>Description of Violation</u>	<u>Regulation</u>
1. No evaluation of whether the phosphating wastes or contents of the surface impoundment are hazardous.	Ohio Administrative Code (OAC) 3745-52-11
2. No labelling of drummed phosphating wastes.	OAC 3745-52-32 & OAC 3745-52-34
3. No written personnel training program.	OAC 3745-65-16
4. No record of employee training; no written job titles or job descriptions.	OAC 3745-65-16
5. No written Contingency Plan.	OAC 3745-65-51
6. No records of inspections/testing of emergency equipment.	OAC 3745-65-33
7. No records of inspections of drummed wastes.	OAC 3745-66-74
8. Less than 2 feet of freeboard in uncovered tanks.	OAC 3745-66-92
9. No daily inspections of tank level and freeboard.	OAC 3745-66-94
10. No weekly inspections of tank construction materials.	OAC 3745-66-94

PIC

e: RB & W
Portage County
OHD004196614
Generator

November 28, 1983

Page 2

Description of Violation

Regulation


- | | |
|---|----------------|
| 11. No manifests prepared for phosphating wastes. | OAC 3745-52-20 |
| 12. Improper maintenance and operation (spillage) of facility at loading areas for spent pickle liquors and plating wastes. | OAC 3745-65-31 |

As mentioned in violation #1 above, RB & W is delinquent in determining whether the wastes in the surface impoundment are hazardous or not. Two separate samplings yielded results which are several orders of magnitude different from one another. You indicated that a third sampling was conducted two weeks ago which would enable you to determine the status of the impoundment. You also agreed to forward the results of the sampling when they arrive. If a determination is made that the wastes are hazardous, then RB & W in Kent would be considered a hazardous waste disposal facility and would be subject to all applicable regulations including ground water monitoring. Your facility would also require an Ohio hazardous waste permit and would be considered as a late filer. As such, your facility would be placed on a schedule to come into compliance with the regulations.

Please respond to this office within thirty (30) days from receipt of this letter your efforts to correct the above listed violations. This letter and a copy of the inspection report will become part of the official record of the Ohio Environmental Protection Agency's Division of Hazardous Materials Management. I am also enclosing, as requested, an order form for a complete set of Ohio's Hazardous Waste regulations.

Please contact me if you have any questions.

Sincerely,


Steve Tuckerman
Environmental Scientist
Division of Hazardous Materials Management
Northeast District Office

ST:km

Enclosure

cc: Paula Cotter, Division of Hazardous Materials Management, Central Office



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

March 13, 1981

Mr. Donald Day
Chief, Office of Land Pollution Control
Ohio Environmental Protection Agency
P. O. Box 1049
Columbus, Ohio 43216

Dear Mr. Day:

Enclosed please find a Manifest Report for Lamsons & Sessions located in Kent, Ohio. The original report was received by this office and is being forwarded to our Enforcement Division. A copy is being sent to you for review and follow-up with the generator located in your State. No explanation from the generator was received besides the Manifest copy regarding the situation surrounding this particular shipment.

Sincerely yours,

Brenda Lillstrom
Acting State Implementation Officer

Enclosure

Russel Burdette
Ward Corp.

OHIO 004 196 614